



## ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276, 217-782-3397  
JAMES R. THOMPSON CENTER, 100 WEST RANDOLPH, SUITE 11-300, CHICAGO, IL 60601, 312-814-6026

ROD R. BLAGOJEVICH, GOVERNOR

RENEE CIPRIANO, DIRECTOR

217/524-3300

January 27, 2005

Certified Mail

7002 3150 0000 1106 3348  
7002 3150 0000 1106 3355

Safety-Kleen Systems, Inc.  
Attn: Robert A. Schoepke, P.G.  
1502 E. Villa, 2<sup>nd</sup> Floor  
Elgin, Illinois 60120

Safety-Kleen (USA), Inc.  
5400 Legacy Drive Cluster II, Building 3  
Plano, Texas 75024-3105

Re: 1790600011 -- Tazewell County  
Safety-Kleen Systems, Inc.  
(Pekin Service Center)  
ILD093862811  
Permit Log No. B96R  
RCRA Part B - Administrative Record

Gentlemen:

This is in response to the withdrawal letter submitted by Kevin Farmer, Environmental, Health and Safety Manager and received by the Illinois EPA on July 21, 2003. This letter asked to withdraw the renewal application for the Part B permit for the RCRA hazardous waste management units at the Safety-Kleen Systems, Inc. (Pekin Service Center), Illinois. The application is identified in our records as B96R.

On November 30, 2004 the Illinois EPA issued a letter stating that all the RCRA units have been properly closed and that all known required corrective action activities have been completed at this time. Therefore a RCRA permit for post-closure care of the units or corrective action at the facility is not required and the Illinois EPA has withdrawn your application as you requested. Subsequently the modifications to the expired Part B Permit (identified in our files as Log Nos. B-96-M-38, B-96-M-41, and B-96-M-42) have also been withdrawn.

Within 35 days after the notification of the final permit decision the applicant may petition for a hearing before the Illinois pollution Control Board to contest the decision of the Illinois EPA, however, the 35-day period for petitioning for a hearing may be extended for a period of time not to exceed 90 days by written notice provided to the Board from the applicant and the Illinois EPA within the 35-day initial appeal period.

Work required by this permit, your application or the regulations may also be subject to other laws governing professional services, such as the Illinois Professional Land Surveyor Act of 1989, the Professional Engineering Practice Act of 1989, the Professional Geologist Licensing Act, and the Structural Engineering Licensing Act of 1989. The permit does not relieve anyone from compliance with these laws and the regulations adopted pursuant to these laws. All work that falls within the scope and definitions of these laws must be performed in compliance with them. The Illinois EPA may refer any discovered violations of these laws to the appropriate regulating authority.

If you have any further questions in this matter, please contact Krishnamurthy S. Gadi, of my staff at 217/524-3863.

Sincerely,

A handwritten signature in black ink, appearing to read "Joyce L. Munie", is written over a horizontal line.

Joyce L. Munie, P.E.  
Manager, Permit Section  
Bureau of Land

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cc: Harriet Croke, USEPA



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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JAMES R. THOMPSON CENTER, 100 WEST RANDOLPH, SUITE 11-300, CHICAGO, IL 60601

ROD R. BLAGOJEVICH, GOVERNOR

RENEE CIPRIANO, DIRECTOR

217/524-3300

July 20, 2004

CERTIFIED MAIL

7002 3150 0000 1110 7608

Safety-Kleen Systems, Inc.  
20 Tucker Drive  
Caseyville, Illinois 62232

Re: 1630250007 -- St. Clair County  
Safety-Kleen Systems, Inc.  
ILD981097819  
Log B-87R  
RCRA Part B -- Administrative Record

Dear Gentlemen:

The Illinois Environmental Protection Agency ("Illinois EPA") has reviewed your application for renewal of the RCRA permit to construct, maintain and operate a waste management facility to store hazardous waste. The application was dated February 2, 2004 and received January 30, 2004, and the response to the Notice of Deficiency ("NOD") was dated March 16, 2004 and received on May 20, 2004. Based upon review of the application and the response to the NOD, the Illinois EPA has determined that your RCRA Part B Renewal Permit Application is administratively complete.

The application was reviewed for completeness only. Pursuant to the requirements of 35 Ill Admin Code 702, 703, 705 and 724 the application will be reviewed for technical adequacy.

If you have any additional questions in this matter, please contact Ukanno Foxworth of my staff at 217/558-4717.

Sincerely,

Joyce L. Munie, P.E.  
Manager, Permit Section  
Bureau of Land

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cc: Harriet Croke, USEPA - Region V  
Safety Kleen System, Inc.

ROCKFORD - 4302 North Main Street, Rockford, IL 61103 - (815) 987-7760 • DES PLAINES - 9511 W. Harrison St., Des Plaines, IL 60016 - (847) 294-4000  
ELGIN - 595 South State, Elgin, IL 60123 - (847) 608-3131 • PEORIA - 5415 N. University St., Peoria, IL 61614 - (309) 693-5463  
BUREAU OF LAND - PEORIA - 7620 N. University St., Peoria, IL 61614 - (309) 693-5462 • CHAMPAIGN - 2125 South First Street, Champaign, IL 61820 - (217) 278-5800  
SPRINGFIELD - 4500 S. Sixth Street Rd., Springfield, IL 62706 - (217) 786-6892 • COLLINSVILLE - 2009 Mall Street, Collinsville, IL 62234 - (618) 346-5120  
MARION - 2309 W. Main St., Suite 116, Marion, IL 62959 - (618) 993-7200



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JAMES R. THOMPSON CENTER, 100 WEST RANDOLPH, SUITE 11-300, CHICAGO, IL 60601

GEORGE H. RYAN, GOVERNOR

RENEE CIPRIANO, DIRECTOR

### ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

#### HAZARDOUS WASTE MANAGEMENT RCRA PART B PERMIT

IEPA #1790600011 -- Tazewell County  
USEPA ILD #093862811  
Safety-Kleen Systems, Inc. (Pekin Service Center)  
Permit Log No.: B-96  
Modification No. 96-M-39  
RCRA Part B – Administrative Record

Issue Date: September 28, 1993  
Effective Date: November 2, 1993  
Expiration Date: November 2, 2003  
Modification Date: December 4, 2002

Safety-Kleen Systems, Inc.  
P.O. Box 11393  
Columbia, South Carolina 29211

Safety-Kleen Systems, Inc.  
Pekin Service Center  
14249 VFW Road  
Pekin, Illinois 61554

A Part B permit is hereby issued pursuant to the Resource Conservation and Recovery Act, Illinois Environmental Protection Act, and Title 35 Illinois Administrative Code (I.A.C.) parts 702, 703, 705, and 720 through 729 to Safety-Kleen to maintain and operate a waste management facility involved in the storage of hazardous waste. Safety-Kleen Systems, Inc. is located at VFW Road in Pekin, Illinois.

This permit consists of the conditions contained herein (including those in any attachments and appendices) and applicable regulations contained in the Illinois Environmental Protection Act and Title 35 I.A.C. Parts 702, 703, 705 and 720 through 729 in effect on the effective date of this permit. The Environmental Protection Act (Ill. Rev. Stat., Chapter 111 1/2, Section 1039) grants the Illinois Environmental Protection Agency the authority to impose conditions on permits which are issued. This Permit contains 97 pages including attachments A through G.

If you have any questions regarding this permit, please contact Todd Lenzie at 217/558-4717.

Sincerely,

Joyce L. Munie, P.E.  
Manager, Permit Section  
Bureau of Land

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RCRA Hazardous Waste Management Permit

Safety-Kleen Systems, Inc.

Pekin Service Center

ILD093862811

## Table of Contents

<u>Item</u>	<u>Page</u>
General Facility Description	i
I. Containers	I-1 - I-8
II. Tank Systems	II-1 - II-9
III. Reporting and Notification Requirements	III-1 - III-5
IV. Corrective Action	IV-1 - IV-12
V. Standard Conditions	V-1 - V-12

## List of Attachments

ILD093862811

	<u>Page</u>
Attachment A -- List of Wastes that can be accepted at this Facility	A-1 - A-3
Attachment B -- Inspection Schedule	B-1 - B-5
Attachment C -- Closure Certification Form	C-1 - C-1
Attachment D -- Special Conditions	D-1 - D-5
Attachment E -- Required Scope of Work for a RCRA Facility Investigation	E-1 - E-15
Attachment F -- Approved RCRA Permit Application Identification	F-1 - F-7
Attachment G -- Financial Assurance Requirements	G-1 - G-1

## DESCRIPTION OF FACILITY

The Pekin Service Center, owned and operated by Safety Kleen Systems, Inc., stores organic chemicals and solvent wastes from industrial and commercial facilities. Wastes accepted include parts cleaner wastes; dry cleaning wastes, paint wastes, spent antifreeze, non-hazardous waste oil, and fluid recovery service wastes (hazardous and non-hazardous wastes that remain on site for less than ten days). The facility is located two miles south of Pekin, Tazewell County, Illinois, on VFW Road, which turns east from Route 29 about 1/3 mile south of Powerton Road on approximately 2.4 acres. The facility address is 14249 VFW Road, Pekin, Illinois 61554.

Several hazardous waste management units exist at the facility. The units include:

1. A flammable waste storage shelter and a warehouse container storage area. ignitable wastes are stored in the flammable waste storage shelter. Non-ignitable wastes are stored in the warehouse container storage area.
2. One 4-pack tank farm and one 10,000 gallon horizontal tank. Only the northwest tank in the 4-pack tank farm and the 10,000 gallon horizontal tank are hazardous waste tanks. The northwest tank in the 4-pack tank farm is used to store waste mineral spirits. The 10,000 gallon horizontal tank is used to store hazardous spent antifreeze. The remaining three tanks are not subject to RCRA requirements. The northeast and southeast tanks in the 4-pack tank farm are used to store non-hazardous waste used oil and non-hazardous antifreeze. The southwest tank in the 4-pack tank farm is used to store product solvents.



## SECTION I: CONTAINER STORAGE

### A. SUMMARY

Containers are managed in the following units:

	<u>Status</u>	<u>Maximum Capacity</u>	<u>Dimensions</u>
Warehouse Storage Area	Existing	4728 gallons	15 ft x 28.75 ft
Flammable Waste Shelter	Existing	2184 gallons	15 ft x 20 ft

Containers of hazardous waste received at the facility for storage will arrive in either 5 gallon steel pails, 15 gallon drums (steel or polyethylene plastic), 16 gallon drums (steel or polyethylene plastic), 30 gallon drums (steel or polyethylene plastic), 55 gallon steel drums, or 85 gallon overpacks. Containers in the storage area must be stored in a manner which is consistent with the NFPA requirements in Section 4.5 NFPA 30. Safety Kleen may accept containers which are of different sizes than those listed above in accordance with the following conditions:

1. The container is DOT approved;
2. The container or its liner is compatible with the waste;
3. The container is in good condition (not rusting or leaking);
4. The facility has the available equipment and experience to properly manage the containers.

### B. WASTE IDENTIFICATION

1. All hazardous waste stored in containers shall be located in the warehouse container storage area or the flammable waste storage shelter. The locations of these storage areas are shown on Figure B-5 of the approved permit application.
2. A maximum of 4728 gallons may be stored in the warehouse container storage area, and a maximum of 2184 gallons of waste may be stored in the flammable waste storage shelter. The Permittee may store new formula immersion cleaner waste, dry cleaning wastes (filter powder and spent filter cartridges), and spent antifreeze in the warehouse container storage area. The Permittee may store paint wastes, parts washer solvent dumpster sediment, old formula immersion cleaner, and mineral spirits dry cleaning wastes in the flammable waste storage shelter. These wastes are identified in Section C-1 of the approved permit application and in Attachment A to this permit.

3. The Permittee is prohibited from storing a hazardous waste that has not been identified in Condition B.2 above.
4. The Permittee may store non-hazardous and hazardous wastes on a ten-day transfer basis in the warehouse container storage area and the flammable waste storage shelter. All transfer wastes must be evaluated for compatibility prior to being placed into these storage areas. In accordance with 35 Ill. Adm. Code 723.112, the Permittee also may store hazardous wastes on a ten-day transfer basis in non-RCRA permitted areas.
5. The Permittee may store non-hazardous transfer waste in containers in the warehouse container storage area and the flammable waste storage shelter for up to ten (10) days without terminating the manifest for such non-hazardous transfer waste at the facility.
6. Storage of hazardous transfer wastes for greater than ten days subjects the container storage unit to the regulatory requirements of 35 IAC 724, Subpart I. Such storage is only permitted under the following conditions:
  - a. The Safety Kleen Pekin facility is the receiving facility designated on the manifest.
  - b. The storage complies with 35 IAC 724 and the conditions of this permit.

C. CONDITION OF CONTAINERS

1. If a container holding waste is not in good condition (e.g., severe rusting, apparent structural defect, etc.) or if it begins to leak (this includes waste which appears on the outside of the drum/box but has not spread to the containment base or other containers), the Permittee must immediately transfer the waste from this container to a container that is in good condition, overpack the container, or manage the waste in accordance with the approved permit application.
2. Any transfer of waste which was required to comply with I(C)(1), must be recorded in a separate log and maintained as part of the facilities operating record.
3. Packaging of all wastes accepted for storage in the container storage area shall meet the requirements of 49 CFR 172, 178 and 179 and all applicable D.O.T. and N.F.P.A. regulations. All containers must be marked and placarded in accordance with 49 CFR 172.

4. The contents of each container shall be clearly identified on the side of the container in accordance with 49 CFR 172 prior to being placed in the container storage area.

D. Compatibility of Waste With Containers

The Permittee must use a container made of or lined with material which will not react with and is otherwise compatible with the waste to be stored so that the ability of the container to contain the waste is not impaired.

E. Management of Containers

The Permittee shall comply with the following management practices:

1. A container holding waste must always be closed during storage, except when it is necessary to add or remove or sample waste.
2. An aisle space of at least two feet shall be maintained in the warehouse container storage area and flammable waste storage area. One foot shall be maintained between pallets, and six inches shall be maintained between the pallets and the walls. Drums not stored on pallets in the flammable waste storage shelter shall be stored no closer than six inches from a wall.
3. Containers may be stacked provided that:
  - a. Only the same size or smaller containers are stacked on top of the containers beneath and;
  - b. DOT approved containers may be stacked up to 3 high without the use of a pallet. Containers may be stacked more than 3 high without the use of a pallet only if the containers have been tested at the proposed stacking height in accordance with DOT stack testing procedures described in 49 CFR 178.606.
  - c. The stacking height does not exceed 6.5 feet.

F. Inspection

The Permittee shall inspect the container storage area weekly in accordance with the inspection schedule specified in Attachment B to this Permit. The inspection must be adequate to detect leaks and deterioration of containers and the containment systems caused by corrosion or other factors. The procedures described in the approved permit application must be used with the following modifications:

1. Action shall be taken to immediately overpack a leaking or deteriorating drum. Appropriate action to clean up any release of waste from a leaking or deteriorated drum shall be carried out immediately after the drum has been overpacked.
2. If a portion of the containment system is found to be in a deteriorated condition (cracks, gaps, spalling, failure of the coating, etc.) the Permittee shall immediately remove all waste containers from the deteriorated area until the containment system has been repaired.
3. The weekly inspection shall include checking aisle spacing, height of stacks and remaining capacity.
4. Results of all inspections and the activities undertaken to correct deficiencies shall be documented in the operating record for the facility.

G. Containment

The Permittee shall construct, operate and maintain the containment system according to the design plans and operating specifications contained in the Approved Permit Application, subject to the following modifications.

1. Safety Kleen shall perform a complete inspection of the surface coating yearly and perform annual maintenance, if necessary, to insure the integrity of the coating.

H. Special Requirements for Ignitable or Reactive Waste

1. The Permittee shall accept reactive waste in containers on a 10-day transfer basis only at the facility.
2. The Permittee shall not locate containers which hold ignitable waste within 50 feet of the facility's property line.
3. The Permittee shall take precautions to prevent accidental ignition or reaction of ignitable waste.
4. Ignitable wastes must be separated and protected from sources of ignition or reaction including but not limited to:
  - a. Open flames, smoking, cutting and welding, hot surfaces, frictional heat, sparks (e.g., static, electrical, or mechanical), spontaneous ignition (e.g., from heat producing chemical reactions), and radiant heat.



- b. While ignitable waste is being handled, the Permittee must confine smoking and open flame to specially designated locations.
- c. "No Smoking" signs must be conspicuously placed wherever there is a hazard from ignitable waste.

I. Special Requirements for Incompatible Waste

- 1. The Permittee shall not store containers holding a material that is incompatible with any waste or other materials stored nearby, unless separated from other waste/materials or protected from them by means of a dike, berm or other devices.

J. General Operating Requirements

The Permittee shall operate the container storage area in accordance with the approved permit application, subject to the following modifications:

- 1. The Permittee may receive hazardous waste for storage in containers provided the following requirements are met.
  - a. The material must be a waste which has been identified in Attachment A to this permit.
  - b. The waste must be analyzed in accordance with the approved waste analysis plan.
  - c. The facility must have a special waste stream permit or generic permit to receive the waste.
  - d. The waste must be accompanied by a properly completed Illinois manifest unless the generator is (a) a conditionally exempt small quantity generator as defined in 35 Ill. Adm. Code 721.105(a), (b) subject to the tolling exemption as defined in 35 Ill. Adm. Code 722.120(e), or (c) otherwise exempt from manifesting requirements under Title 35 of the Illinois Administrative Code.
- 2. Cleanup of all spills inside the secondary containment areas must begin immediately upon discovery and be completed within 24 hours. Secondary containment must be inspected immediately after cleanup for cracks, gaps or other defects (failure of the coating) which would allow waste to migrate to the underlying soil. If any deterioration is discovered, the permittee shall immediately remove all waste from the deteriorated area.
- 3. The permittee shall remove any precipitation which accumulates in the secondary containment system within 24 hours of the time such accumulation is discovered.

K. Closure Requirements

At closure, all waste and waste residues must be removed from the containment system(s). Remaining containers, liners, bases and soil containing or contaminated with waste or waste residue must be decontaminated or removed. Closure of the container storage area(s) shall be carried out in accordance with the closure plan in the approved permit application, as modified below:

1. The permittee shall notify the Agency's Division of Land Pollution Control in writing of its intent to close the container storage area(s) at least 180 days prior to the date closure is expected to begin. Along with this notification, the Permittee shall submit the sampling and analysis plan to be used in demonstrating the storage area has been properly decontaminated. This plan shall be approved by the Agency's Division of Land Pollution Control in writing prior to being implemented. Agency review of this plan will be subject to the permit appeal provisions contained in Sections 39(a) and 40(a) of the Environmental Protection Act. The response from the Agency shall approve and establish:
  - a. The sampling plan;
  - b. What contaminants must be analyzed for; and
  - c. The level at which decontamination is considered complete.
2. The concrete surfaces shall be visually inspected, photographed, and all residue adhering to the surface must be removed by scraping and/or brushing, followed by steam cleaning and triple rinsing the concrete surfaces. All wash and rinse waste shall be collected and managed as a hazardous waste. The pad(s) must either be certified by an independent, registered, professional engineer that the surface has no cracks, gaps, or other defects which would allow waste to migrate through to the underlying soil or sampling shall be conducted to verify the underlying soil is uncontaminated.
3. Sweepings collected during closure of the container storage area shall be managed as a hazardous waste. All washwater and rinsate generated during the closure of these units shall also be managed as a hazardous waste unless analyses indicates the sweepings are a non-hazardous waste.
4. The Permittee shall provide post-closure care in accordance with 35 IAC, Subtitle G, Part 724, for the container storage area(s) if all of the hazardous wastes or contaminated soils cannot be practicably removed or decontaminated in accordance with the closure requirements outlined in the permit and in the approved closure plan.

If it is determined that the closure requirements cannot be met and post-closure care for the container storage area(s) is required, this Permit will be modified to require post-closure care of the container storage area(s) in accordance with 35 IAC, Subtitle G, Part 724, Subparts G and H.

5. Should post-closure care, as described in Condition K.4 above, become necessary, the Permittee shall submit an application for modification to this permit, including an amended closure and post-closure care plan for this unit, within thirty (30) days following discovery that clean closure cannot be accomplished. If a determination is made to not pursue clean closure prior to the implementation of the closure plan for the container storage area, the modification request shall be made no later than sixty (60) days after the determination is made.
6. Financial assurance for closure and post-closure of the container storage area(s), if required in accordance with Condition K.4 and K.5 above, shall be provided within thirty (30) days following modification of the permit under the provisions of Condition K.5 above.
7. Within sixty (60) days after closure of the container storage area(s) is complete, the Permittee shall submit certification to the Agency that the unit has been closed in accordance with the approved closure plan.

The closure certification form in Attachment C to this permit or a certification with identical wording must be used. Signatures must meet the requirements of 35 Ill. Adm. Code, Section 702.126. The independent engineer should be present at all critical, major points (activities) during the closure. These might include soil sampling, soil removal, backfilling, final cover placement, etc. The frequency of inspections by the independent engineer must be sufficient to determine the adequacy of each critical activity. Financial assurance must be maintained for the container storage area until the Agency approves the closure certification for the unit. The Agency's review of closure certifications for partial or final closure will be conducted in accordance with 35 IAC 724.243.

A Closure Documentation Report is to be submitted with the closure certification which includes the following activities:

- a. The volume of waste and waste residue removed, including wastes resulting from decontamination activities;
- b. A description of the method of waste handling and transport;
- c. Copies of the waste manifests;

- d. A description of the sampling and analytical methods used;
  - e. A chronological summary of closure activities and the cost involved;
  - f. Tests performed, methods and results; and
  - g. Color photographs of closure activities which document conditions before, during and after closure.
8. Under the provisions of 29 CFR 1910 (51 FR 15,654, December 19, 1986), cleanup operations must meet the applicable requirements of OSHA's Hazardous Waste Operations and Emergency Response standard. These requirements include hazard communication, medical surveillance, health and safety programs, air monitoring, decontamination and training. General site workers engaged in activities that expose or potentially expose them to hazardous substances must receive a minimum of three days of actual field experience under the direct supervision of a trained experienced supervisor. Managers and supervisors at the cleanup site must have at least an additional eight hours of specialized training on managing hazardous waste operations.
9. If the Agency determines that implementation of this closure plan fails to satisfy the requirements of 35 Ill. Adm. Code, Section 724.211, the Agency reserves the right to amend the closure plan. Revisions of closure plans are subject to the appeal provisions of Section 40 of the Illinois Environmental Protection Act.
10. Please be advised that the requirements of the Responsible Property Transfer Act (Public Act 85-1228) may apply to your facility due to the management of RCRA hazardous waste. In addition, please be advised that if you store on-site generated hazardous waste in containers or tanks pursuant to 35 IAC 722.134, those units are subject to the closure requirements identified in 35 IAC 722.134(a)(1).



## SECTION II: TANK SYSTEMS

### A. SUMMARY

Each tank at the Pekin Service Center are used for a variety of purposes, including product storage, hazardous waste storage and waste oil storage. Of these uses, the storage of hazardous waste is the only use that is regulated under RCRA. Associated with this activity are these two existing above ground tanks, each of which is dedicated to the storage of a particular waste. All above ground tank areas have secondary containment consisting of a concrete vault and an impermeable membrane or coating which has been applied to the concrete.

### B. WASTE IDENTIFICATION

1. The Permittee may store a total volume of 28,500 gallons of waste in the tanks listed below subject to the terms of this permit.

<u>Tank Number</u>	<u>Material of Construction</u>	<u>Dimensions Ht./length Dia.</u>	<u>Capacity in Gallons</u>	<u>Status</u>	<u>Minimum Shell Thickness in Inches</u>
1*	CS	26'12'	20,000	existing	0.1875
2**	CS	26' 8'	10,000	existing	0.25

\*northwest tank in the 4-pack tank farm

\*\*horizontal tank next to the flammable waste storage shelter

2. The Permittee may store a total of 19,000 gallons of spent parts washer solvent (105 parts washer solvent) as identified in Section C-1 of the approved permit application, 140 parts washer solvent, and 150 parts washer solvent, and spent parts washer solvent in the northwest tank of the 4-pack tank farm.
3. The Permittee may store a total of 9,500 gallons of spent antifreeze as identified in Section C-1 of the approved permit application in the horizontal 10,000 gallon aboveground tank located next to the flammable waste storage shelter.
4. Storage of waste in tanks other than those specifically identified in II(B)(1), II(B)(2), and II(B)(3) is prohibited.

C. CONTAINMENT AND DETECTION OF RELEASES

1. The Permittee shall maintain secondary containment which meets the requirements of 35 IAC 724.293 (as amended 7/16/87) for each tank identified above.
2. The Permittee shall operate and maintain the tank systems according to the detailed plans and reports contained in the approved permit application, subject to the following modifications:
  - a. The Permittee shall maintain the concrete slab, the curbs, and the walls that are used as part of the containment with an impermeable interior surface coating that:
    - 1) is compatible with the waste, or any other liquid, stored in the containment system and;
    - 2) will prevent migration of the waste into the concrete of the slab or wall.
  - b. The Permittee shall perform a complete inspection of the surface coating yearly and perform annual maintenance to insure the integrity of the coating.
  - c. The Permittee shall maintain a compatible caulking or sealant at each existing joint to make the joint liquid tight. These joints include but are not limited to; all construction joints within the slab, walls and curbs and joints between the slab and curb, between two curbs, between the slab or curb and wall and joints between two walls. The caulking or sealant shall be compatible with the stored waste, or any other liquid, stored in the same containment system with the hazardous waste.
  - d. The Permittee shall paint the vault system of the 10,000 gallon horizontal tank within 30 days of the effective date of this permit.

D. GENERAL OPERATING REQUIREMENTS

1. The Permittee shall not place hazardous wastes in a tank system if they could cause the tank, its ancillary equipment, or the containment system to rupture, leak, corrode, or otherwise fail.
2. The Permittee shall use appropriate controls and practices to prevent spills and overflows from tank or containment systems using the methods specified in the Approved Permit Application, subject to the following modifications:

- a. All hazardous waste storage tanks shall be equipped with automatic waste feed shut-off valves connected to the continuously monitored liquid-level sensors which are activated when the tank is 95% full or;
  - b. All hazardous waste storage tanks shall be equipped with audible alarms which are activated when the tank is 95% full.
3. All hazardous wastes to be received at the tank storage area must be spent mineral spirits or spent antifreeze identified in Section C-1 of the approved permit application and in Attachment A to this permit and have been analyzed per the requirements identified in the waste analysis plan. In addition, all hazardous and non-hazardous special wastes received at the facility must be permitted by an IEPA issued special waste permit and be accompanied by a properly completed Illinois manifest unless the generator is a conditionally exempt small quantity generator as defined in 35 IAC 721.105(a).
  4. An employee of Safety Kleen shall be present at all times when waste is being transferred from a tank truck to the receiving tank.
  5. Precipitation accumulating within the tank farm shall be removed within 24 hours of discovery.

E. RESPONSE TO LEAKS OR SPILLS

In the event of a leak or a spill from the tank system, from a secondary containment system, or if a system becomes unfit (i.e., failure of the coating) for continued use, the Permittee shall remove the system from service immediately and complete the following actions (35 IAC 724.296(a)-(f)):

1. Stop the flow of hazardous waste into the system and inspect the system to determine the cause of the release.
2. Remove all waste as necessary from the system within 24 hours of the detection of the leak to prevent further release and to allow inspection and repair of the system. If the Permittee finds that it will be impossible to meet this time period, the Permittee shall notify the Agency and demonstrate that the longer time period is required.
3. If the collected material is a RCRA hazardous waste, it must be managed in accordance with all applicable requirements of 35 IAC Parts 722-724.

4. Contain visible releases to the environment. The Permittee shall immediately conduct a visual inspection of all releases to the environment and based on that inspection: (1) prevent further migration of the leak of spill to soils or surface water and (2) remove and properly dispose of any visible contamination of the soil or surface water.
5. Close the system in accordance with the Closure Plan, contained in the approved Permit Application, unless the following actions are taken:
  - b. For a release caused by a leak from the primary tank system to the secondary containment system, the Permittee shall repair the primary system prior to returning it to service.

F. INSPECTIONS

1. The owner or operator must inspect in accordance with the inspection schedule in Attachment B to this Permit.
2. If a leak or spill is observed during the daily inspections, the Permittee shall immediately remove the tank system in question from service and follow the procedures set forth in 35 IAC 724.296.
3. Releases of hazardous waste from spills and leaks which are observed in the secondary containment system shall be removed within the same operating shift during which they are detected and managed as a hazardous waste.
4. The Permittee shall inspect each tank system to assess its condition. This inspection shall consist of a visual inspection, a pressure test and an ultrasonic thickness test in accordance with the following procedures:
  - a. An ultrasonic thickness test shall be conducted annually on the tank. This test may be conducted by Safety-Kleen personnel that have been trained on all ultrasonic thickness testing procedures.
  - b. A hydrostatic leak test or other integrity assessment as approved by the Agency shall be conducted annually on ancillary equipment which cannot be visually inspected daily. The hydrostatic leak test or other integrity assessment may be conducted by Safety-Kleen personnel that have been trained on the applicable testing procedures.
  - c. A detailed visual inspection of the tank's interior shall be conducted every fifth year to ensure the tank's integrity. During this internal inspection, the internal



surface shall be inspected for rust, cracks and thin areas. Corrective action as specified by a qualified registered professional engineer or corrosion technician shall be taken if the internal inspection indicates that the interior surface of a tank system has been detrimentally affected by the hazardous waste which has been stored in it. Tanks shall be entered in accordance with 29 CFR 1910.94(d)(11). The first internal inspection shall be conducted in accordance with the following schedule:

- i. Spent mineral spirit tank by the end of 1994.
- ii. Spent antifreeze tank by the end of 1995.
- d. If the testing conducted as required by II(F)(4)(a) or (c) above indicates the present rate of corrosion may cause reduction of the shell thickness below the permitted minimum shell thickness, within 5 years. The next inspection shall take place one year prior to the estimated date of failure.
- e. The inspection of each tank shall be certified by a qualified, registered professional engineer, or corrosion technician.
- f. All waste and washwater generated during evacuation of the tanks shall be managed as a hazardous waste unless analyses indicates the waste and washwater are non-hazardous waste.
- g. Results of the inspection identified in 4(a), (b), and (c) above shall be submitted to the Division of Land Pollution Control of this Agency within 60 days of the inspection date, and shall also be included in the operating record of this facility.
- h. If the results of these inspections indicate a tank system is leaking, the procedures set forth in 35 IAC 724.296 (as amended July 16, 1987) shall be followed.

G. REPORTING AND RECORDKEEPING

- 1. The Permittee shall report to the Agency's Division of Land Pollution Control Field Office within twenty-four (24) hours of detection of a leak or spill which has occurred in the tank system or secondary containment system unless the spill or leak is less than 50 gallons of spent antifreeze or spent mineral spirits and it is immediately contained and cleaned up.

2. Within thirty (30) days of detecting a release as described above to the environment from the tank system or secondary containment system, the Permittee shall report the following information in writing to the Division of Land Pollution Control of this Agency:
  - a. Likely route of migration of the release;
  - b. Characteristics of surrounding soil (including soil composition, geology, hydrogeology, and climate);
  - c. Results of any monitoring or sampling conducted in connection with the release;
  - d. Proximity to downgradient drinking water, surface water, and populated areas;
  - e. Description of response actions taken or planned
3. The permittee shall submit to the Agency all certifications of major repairs to correct leaks within seven days from returning the tank system to use (35 IAC 724.296(f)).

#### H. SPECIAL REQUIREMENTS FOR IGNITABLE OR REACTIVE WASTES

1. The Permittee shall not place ignitable waste in the tank system, unless the procedures specified in the Approved Permit Application are followed.
2. The Permittee shall comply with the requirements for the maintenance of protective distances between the waste management area and any public ways, streets, alleys, or an adjoining property line that can be built upon as required in Tables 2-1 through 2-6 of the National Fire Protection Association's "Flammable and Combustible Liquids Code" (1987).
3. The Permittee shall not place reactive waste/material in the tank systems at this facility.

#### I. SPECIAL REQUIREMENTS FOR INCOMPATIBLE WASTES

1. The Permittee shall not place incompatible wastes together in the same tank system. The facility shall not store waste in a tank which previously held an incompatible waste, unless the tank system has been decontaminated.

J. CLOSURE

At closure, all waste and waste residues must be removed from tanks, discharge control equipment and discharge confined structures. Closure of the tank storage area shall be carried out in accordance with the closure plan in the approved permit application, as modified below:

1. The Permittee shall notify the Agency's Division of Land Pollution Control in writing of its intent to close the tank system at least 180 days prior to the date closure is expected to begin. Along with this notification, the Permittee shall submit the sampling and analysis plan to be used in demonstrating a tank system has been properly decontaminated. The plan shall be approved by the Agency's Division of Land Pollution Control in writing prior to being implemented. Agency review of this plan will be subject to the permit appeal provisions contained in Section 39(a) and 40(a) of the Illinois Environmental Protection Act. The response from the Agency shall approve and establish:
  - a. The sampling plan;
  - b. What contaminants must be analyzed for;
  - c. The level at which decontamination is considered complete.
2. The concrete surfaces shall be visually inspected, photographed and any residue adhering to the surface must be removed by scraping and/or brushing. Following this, the concrete surfaces must be steam cleaned and triple rinsed. All wash and rinse water shall be collected. For tank systems which include secondary containment systems which met the requirements of 35 IAC 724.293 at the time of installation, the secondary containment must be certified by an independent, registered, professional engineer indicating that the surface has no cracks, gaps or other defects which would allow waste to migrate through to the underlying soil. If such a certification cannot be made, soil sampling and analysis must be conducted to establish clean closure.
3. Sweepings collected during closure of any tank system shall be managed as a hazardous waste. All washwater and rinsate generated during the closure of these units shall also be managed as a hazardous waste unless analyses indicates the sweepings are a non-hazardous waste.
4. The Permittee shall provide post-closure care in accordance with 35 IAC Part 724 for a tank system if all of the hazardous wastes or contaminated soils cannot be practicably removed or decontaminated in accordance with the closure requirements outlined in

this permit and in the approved closure plan. If it is determined that the closure requirements cannot be met and post-closure care is required, the tank system shall be considered to be a landfill and the post-closure care plan in the approved application will be modified as required to provide adequate post-closure care for the affected tank system(s) in accordance with 35 IAC, Subtitle G, Part 724, Subparts G and H.

5. Should post-closure care, as described in Condition 3 above, become necessary, the Permittee shall submit an application for modification to this permit, including an amended closure plan and post-closure care plan for the affected tank system within thirty (30) days following discovery that clean closure cannot be accomplished. If a determination is made not to pursue clean closure prior to the implementation of the closure plan for the tank system, the modification request shall be made no later than sixty (60) days after the determination is made.
6. Financial assurance for closure and post-closure of any tank system being closed as a landfill, when required in accordance with Conditions 3 and 4 above, shall be updated within thirty (30) days following modification of the permit under the provisions of Condition 4 above.
7. Within sixty (60) days after closure of any tank system is complete, the Permittee shall submit certification to the Agency that the unit has been closed in accordance with the approved closure plan.

The closure certification form in Attachment C to this permit or a certification with identical wording must be used. Signatures must meet the requirements of 35 Ill. Adm. Code Section 702.126. The independent engineer should be present at all critical major points (activities) during the closure. This might include soil sampling, soil removal, backfilling, final cover placement, etc. The frequency of inspections by the independent engineer must be sufficient to determine the adequacy of each critical activity. Financial assurance must be maintained for each tank system identified in Condition B.1 above. Documents regarding financial assurance for closure of this facility may be modified after the Agency approves the closure certification for any or all of the tank systems. The Agency's review of closure certifications for partial or final closure will be reviewed in accordance with 35 IAC 724.243.

A Closure Documentation Report is to be submitted with the closure certification which includes the following items, if applicable:

- a. The volume of waste and waste residue removed, including wastes generated during decontamination procedures.

- b. A description of the method of waste handling and transport.
- c. Copies of the waste manifests.
- d. A description of the sampling and analytical methods used.
- e. A chronological summary of closure activities and the cost involved.
- f. Tests performed, methods and results.
- g. Color photographs of closure activities which document conditions before, during and after closure.

### Section III: REPORTING AND NOTIFICATION REQUIREMENTS

The reporting and notification requirements of each section of the RCRA permit are summarized below. This summary is provided to highlight the various reporting and notification requirements of this permit.

<u>Condition</u>	<u>Submittal</u>	<u>Due Date</u>
SECTION I: CONTAINERS		
K(1)	Notify Agency of intent to close the container storage area	180 days prior to commencement of closure
K(1)	Submit sampling and analysis plan for review	180 days prior to commencement of closure
K(5)	Submit application for modification of permit and post-closure care plan	No later than 30 after determination that the container storage area cannot be clean closed
K(6)	Update financial assurance to include modification in Conditions 1(K)(4) or I(K)(5)	30 days after permit is modified
K(7)	Submit certification for closure of the container storage area	Within 60 days after closure is completed
SECTION II: TANK SYSTEMS		
C(2)(d)	Paint the vault system of the 10,000 gallon horizontal tank this permit	Within 30 days of effective date of
F(4)(f)	Results of tank integrity assessment	60 days after inspection

G(1)	Notify Agency of a leak or spill unless the spill or leak of hazardous waste is less than or equal to 50 gallons of spent antifreeze or spent mineral spirits	24 hours after detection of leak or spill
G(2)	Report to Agency on release and Permittee's response	30 days after leak or spill occurs
G(3)	Certification of major repairs	Within seven days from returning tank system to service
J(1)	Notify Agency of intent to close tank system(s)	180 days prior to commencement of closure
J(1)	Submit sampling and analysis plan	180 days prior to commencement of closure
J(4)	Submit application for permit modification and post-closure care plan	30 days after determination that a tank system must be closed as a landfill
J(5)	Financial Assurance for closure or post-closure	30 days after effective date of permit or modification of permit or 30 days after close of the fiscal year
J(6)	Submit certification of closure of tank system(s)	60 days after closure of tank system(s) is complete

SECTION IV: CORRECTIVE ACTION

B	Submit a RCRA Facility Investigation (RFI) Phase 1 Workplan	within 4 months after effective date of this permit
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SECTION V: STANDARD CONDITIONS

6	Complete application for new permit	180 days prior to permit expiration
11	Information requested by Agency and copies of records required to be kept by this permit	Submittal date to be determined by Agency
14	Notify Agency of planned physical alterations or additions	15 days prior to planned change
15	Notify Agency of changes which may result in permit noncompliance	Within 15 days of change
16	Application for permit modification indicating permit is to be transferred	At least 90 days prior to transfer date
18	Submission of any information required in a compliance schedule	14 days after each schedule date
19	Report to Agency any non-compliance which may endanger health or environment	
	by telephone	24 hours after discovery
	in writing	5 days after discovery
20	Report all other instances of noncompliance	March 1 of each year along with Annual Report



28	Notify the Regional Administrative in writing of expected receipt of hazardous waste from a foreign source	4 weeks prior to receipt of waste
40	Update arrangements with local authorities	At least annually
41	Implementation of Contingency Plan	
	Notify appropriate state and local agencies with designated response roles	As needed
	Notify appropriate local officials	Immediately, if emergency coordinator's assessment indicates evacuation of local area is advisable
	Notify the Agency (217/782-3637) and Illinois ESDA (217/782-7860) if emergency coordinator determines there has been a release, fire or explosion which could threaten human health or the environment, outside the facility	Immediately after determination made
	Notify Agency and appropriate state and local authorities, in writing that facility is in compliance with 35 IAC 724.156(h)	Prior to resuming operation in affected areas
	Report to Agency details regarding incident which required implementation of contingency plan	15 days after event
47	Submit annual report required by 35 IAC 724.175	March 1 of each year

49	Application for permit modification amending closure plan	Within 90 days of discovery of need for modification
50	Notify Agency that expecting to close	60 days prior to beginning closure
54(a)	Adjust closure cost estimate for inflation	30 days after close of fiscal year
54(b)	Revision of closure cost estimate	As needed, within 90 days of discovery of revision
55	Change in financial assurance mechanism for closure	As needed
56	Change in coverage for sudden and non-sudden accidental occurrences	As needed
57	Notify Agency of commencement of voluntary or involuntary bankruptcy proceedings	10 days after commencement of proceeding

ATTACHMENT D: ADDITIONAL SPECIAL CONDITIONS

C(1)	Submit closure plan	180 days prior to closure of any hazardous waste management unit
D(1)	Submit an engineering certification that the 10,000 gallon horizontal tank and piping have been painted	Within 60 days of the effective date of this permit
E(2)	Notify Emergency Response Teams	Immediately upon implementation of contingency plan

- |      |   |   |
|------|---|---|
| E(3) | Documentation of submittal of required information to Emergency Response entities | within 60 days of the effective date of this permit |
| E(4) | Documentation of agreements/arrangements with local units                         | within 60 days of the effective date of this permit |

## SECTION IV: CORRECTIVE ACTION

### A. INTRODUCTION

In accordance with Section 3004 of RCRA and 35 IAC 724.201, the Permittee shall institute such corrective action as necessary to protect human health and the environment from all releases of hazardous wastes or hazardous constituents, listed in Appendix H of 35 IAC Part 721, from any solid waste management unit (SWMU) at its facility in Pekin, Illinois. This shall be accomplished by:

1. Conducting a RCRA Facility Investigation (RFI) to determine whether releases of hazardous wastes and hazardous constituents have occurred from any solid waste management unit (SWMU) at its Pekin facility, and if so, the nature and extent of the release(s).
2. Based upon the results of the RFI, developing and implementing a Corrective Action Plan which describes the necessary corrective actions which will be taken. The required corrective actions shall be those actions necessary to protect human health and the environment from all releases of hazardous wastes or hazardous constituents, listed in Appendix H of 35 IAC Part 721, from any of the SWMUs determined to pose an environmental threat by the RFI required under the terms and conditions of this permit.

### B. CONDUCTING THE RCRA FACILITY INVESTIGATION

The Permittee must conduct a RCRA Facility Investigation to determine the nature and extent of releases of hazardous wastes and hazardous constituents from certain SWMUs at the subject facility. This RFI shall be carried out in three phases. Each phase will provide for a more detailed evaluation of each Solid Waste Management Unit identified. The requirements for the RFI are provided in Attachment E to the permit.

1. Based upon the results of the RCRA Facility Assessment which was conducted by the Agency for this facility, the SWMUs identified in the table below must be evaluated in the RFI for potential releases to certain environmental media of concern also identified in the table. (Please note that this is not a complete listing of SWMUs at the subject facility.):

<u>SWMU #</u>	<u>Unit</u>	<u>Environmental Media of Concern</u>
13	Warehouse Container Storage Area Trenches	soil, groundwater
14	Warehouse Drain	soil, groundwater
16	Past Oil Spill	soil, groundwater

2. The Permittee shall submit to the Illinois Environmental Protection Agency's Division of Land Pollution Control (Agency's DLPC) Permit Section, within 120 days after the effective date of this permit, a written RCRA Facility Investigation (RFI) Phase I Workplan. In general, the Phase I RFI Workplan must contain the following:
  - a. General information regarding the Safety Kleen facility in Pekin, Illinois.
  - b. Information, as it is available, regarding each SWMU identified in Condition IV.B.1 above which (1) characterizes the unit, (2) describes its history of operations, and (3) documents the unit's integrity.
  - c. Proposed procedures, including field activities, to determine the absence or presence of releases of hazardous waste or hazardous constituents to the soil and/or air from each SWMU which is determined, based on the unit and waste characterization in IV.B.2.b, to have a potential to have released hazardous waste or hazardous constituents to the environmental media.

More specific requirements regarding what must be contained in the Phase I Workplan are contained in Attachment E to this permit.
3. The Agency's DLPC will approve, approve with modifications, or disapprove the Phase I Workplan in writing and provide comments regarding the necessary corrections or modifications.
  - a. Within 60 days of receipt of such comments, the Permittee must modify the plan or submit a new plan for the Agency's DLPC approval.
  - b. Within 30 days of the Agency's DLPC approval of the RFI Phase I Workplan, the Permittee shall begin implementing the Workplan according to the terms and schedule in the Workplan.
  - c. Agency action on the Phase I Workplan will be subject to the appeal provisions of Sections 39(a) and 40(a) of the Illinois Environmental Protection Act.

4. The Permittee must submit a report documenting the efforts carried out as set forth in the approved RFI Phase I Work Plan in accordance with the schedule established in the approved Workplan. This report must be organized so as to present a comprehensive and coherent description of the sources, nature and extent of soil contamination discovered at each SWMU during the Phase I RFI. The report must also discuss and evaluate the results of the Phase I RFI associated with each SWMU and include conclusions related to the need for additional investigation at each SWMU as part of a Phase II RFI. This report must be prepared in accordance with (1) the Data Management Plan which is to be a part of the RFI Phase I Workplan (see Item III.F of Attachment E to this permit) and (2) any modifications to the Workplan imposed by the Agency as part of its approval of the workplan.
  - a. Since the report must include conclusions related to the need for a Phase II investigation, it must contain proposed concentrations which will be used to make this determination. Justification for these proposed values must also be included in the report.
5. Following the submittal of the RFI Phase I report, the Agency's DLPC will review the submitted data and notify the Permittee in writing of the results of the review. This notification will discuss the status of each of the SWMUs evaluated as part of Phase I of the RFI.
  - a. If the Agency's DLPC determines, based upon the data provided within and obtained from the Phase I Workplan for each SWMU investigated, that (1) there is no potential for release from that SWMU to the environmental media of concern and (2) there has been no release of hazardous wastes or hazardous constituents to the environmental media of concern from that SWMU, then no further action will be required for that SWMU.
  - b. If the Agency's DLPC determines, based on the data from the Phase I RFI for each SWMU investigated, that (1) there has been a release to any environmental media of concern, (2) there currently is a release to any environmental media of concern, or (3) the data associated with a given SWMU is inconclusive, then the Permittee will be required to conduct additional investigation of the SWMU as part of Phase II and, if necessary, Phase III of the RFI.
  - c. The final letter sent to the facility conveying the results of the review will:
    1. Identify those SWMUs for which no further investigation is needed;

2. Identify which SWMUs which must be further investigated to determine the rate and extent of migration of hazardous waste or hazardous constituents and the concentrations of the hazardous waste or hazardous constituents in the environmental media potentially impacted by the SWMU;
  3. Identify, for each SWMU requiring further investigation, the associated environmental media which must be further investigated;
  4. Indicate whether the facility must perform a Phase II and/or a Phase III RFI Investigation for those SWMUs requiring further investigation. Unless sufficient information is provided to the Agency as a result of additional investigation in the Phase II investigation, units which have the possibility of releasing hazardous waste or hazardous constituents to groundwater must be evaluated as part of Phase III of the RFA.
- d. Agency action on the final Phase I RFI report and proposed cleanup objectives will be subject to the appeal provisions of Sections 39(a) and 40(a) of the Illinois Environmental Protection Act.
6. If the Permittee is notified in writing in accordance with Condition IV.B.5.c that any SWMUs identified in Condition IV.B.1 above must be included in Phase II of the RFI, then the Permittee must develop and submit a Phase II RFI Workplan. Phase II of the RFA shall focus on determining the rate and extent of migration of hazardous waste or hazardous constituents and the concentrations of the hazardous waste or hazardous constituents in the soil and/or air potentially impacted by the SWMU. Only the media potentially impacted by each SWMU as identified in the Agency notification set forth in Condition IV.B.5.c above must be investigated. Such a workplan must be submitted no more than 90 days after the facility is notified in writing in accordance with Condition IV.B.5.c above. The requirements for a Phase II of the RFI are contained in Attachment E to the permit.
  7. The Agency's DLPC will approve, modify and approve, or disapprove the Phase II workplan in writing and provide comments regarding the required corrections or modifications.
    - a. Within 60 days of the receipt of such comments, the Permittee must modify the plan or submit a new plan for the Agency's DLPC approval.
    - b. Within 30 days of the Agency's DLPC approval of the RFI Phase II Workplan, the Permittee shall begin implementing the plan according to the terms and schedule established in the Phase II Workplan.

- c. Agency action on the Phase II workplan will be subject to the appeal provisions of Sections 39(a) and 40(a) of the Illinois Environmental Protection Act.
8. The Permittee must submit a report documenting the efforts carried out in accordance with the approved RFI Phase II Workplan in accordance with the schedule established with in the Phase II Workplan. This report must be prepared in a manner which is similar to that specified in Condition IV.B.4 above.
- a. Should the Permittee wish to propose target soil cleanup objectives for corrective measures, such a proposal must be submitted to the Agency upon submittal of the RFI Phase II report. Such a request must consider distance from the subject SWMU(s) to potential receptors, 35 IAC 620 groundwater quality standards, and it must provide an assessment of potential threats to human health and the environment in proposing soil, surface water or groundwater target cleanup objectives (i.e., the proposal should include a site and contaminant specific risk assessment which ensures that alternative target cleanup objectives will not allow the groundwater quality standards to be exceeded, or pose a threat to human health and the environment). The Agency will establish cleanup objectives for corrective measures if no objectives are proposed by the Permittee.
9. Following submittal of the RFI Phase II report, the Agency's DLPC will review the data obtained from the RFI Phase II investigation and notify the Permittee in writing of the results.
- a. If the Agency determines that there is a potential that groundwater has been impacted by a release of hazardous wastes or hazardous constituents from any SWMU evaluated during the Phase II investigation, then the Permittee must conduct Phase III of the RFI for such SWMUs. The purpose of the Phase III investigation of the RFI will be to define the extent of releases, both on-site and off-site, to the groundwater from SWMUs for which the results of the Phase II investigation indicate a release to groundwater. The requirements associated with a Phase III Investigation are contained in Attachment E to this permit.
  - b. If the Agency's DLPC determines that a RFI Phase III investigation is not required, based on data obtained from the RFI Phase II investigation, the Agency reserves the right to require that corrective measures be conducted for the SWMU(s) of concern to address releases identified through the Phase I and Phase II investigations.



- c. The Agency's response to the Phase II report will:
    - i. Identify those SWMUs and associated environmental media for which Phase III of the RFI must be conducted; and,
    - ii. Identify those SWMUs and associated environmental media for which corrective action is required, although no Phase III investigation is required.
  - d. Agency action on the final RFI Phase II report will be subject to the appeal provisions of Sections 39(a) and 40(a) of the Illinois Environmental Protection Act.
10. Within 90 days of notification of the need for a Phase III investigation, the Permittee shall submit a plan for conducting Phase III of the RFI. The Agency's DLPC will approve, modify and approve, or disapprove and provide comments to the Permittee as to the corrections or modifications needed for the RFI Phase III Workplan.
- a. Within 60 days of receipt of such comments, the Permittee must modify the plan or submit a new plan for the Agency's DLPC approval.
  - b. Within 30 days of the Agency's DLPC approval of the RFI Phase III Workplan, the Permittee shall begin implementing the plan according to the terms and schedule established within the Workplan.
  - c. Agency action on the Phase III workplan will be subject to the appeal provisions of Sections 39(a) and 40(a) of the Illinois Environmental Protection Act.
11. Within 120 days of receipt of the Agency's response identified in Condition IV.B.9.c, the Permittee shall submit to the Agency's DLPC a Corrective Action Plan (CAP), in accordance with the requirements outlined in Condition IV.C. below for those SWMUs identified in the response as requiring corrective action that do not need to evaluate as part of the Phase III investigation.
12. The Permittee must submit a report documenting the efforts carried out in accordance with the approved RFA Phase III Workplan in accordance with the schedule set forth in that workplan. This report must be prepared in a manner which is similar to that specified in Condition IV.B.4 above.

13. Following submittal of the RFI Phase III report, the Agency's DLPC will review the data contained in the report and notify the Permittee in writing of the results.
  - a. If the Agency determines that there has been a release of hazardous waste or hazardous constituents from a SWMU to the groundwater, then the Permittee must perform corrective action, as necessary, to protect human health and the environment.
  - b. If the Agency determines that there (1) has not been a release of hazardous waste or hazardous constituents from a SWMU to the groundwater and (2) is no potential for releases of hazardous waste or hazardous constituents from a SWMU to the groundwater, then no corrective action will be required at that SWMU relating to groundwater.
  - c. If the Agency determines (1) that there has not been a release of hazardous waste or hazardous constituents from a SWMU to the groundwater and (2) that there is a potential for future releases of hazardous waste or hazardous constituents from a SWMU to the groundwater, then the Agency may require a longer term groundwater monitoring program at any SWMU where substantial soil contamination exists (as determined by the Agency), or at any SWMU which would meet the definition of a land disposal unit.
  - d. The Agency's response to the Phase III report will:
    - i. Identify those SWMUs investigated as part of Phase III of the RFI from which there has been a release of hazardous waste or hazardous constituents to groundwater that requires corrective action;
    - ii. Identify those SWMUs investigated as part of Phase III of the RFI for which no corrective action is required for groundwater at this time;
    - iii. Identify those land-based SWMUs investigated as part of the Phase III RFI for which a longer term groundwater monitoring program must be established. "Land-based SWMUs" are SWMUs where waste, contaminated soil and/or contaminated groundwater are allowed to remain in-place.
  - e. Agency action on the Phase III Workplan will be subject to the appeal provisions of Sections 39(a) of the Illinois Environmental Protection Act.

14. If the Agency's notification identified in Condition IV.B.13.d above requires that corrective action be performed for releases of hazardous waste or hazardous constituents to the groundwater from certain SWMUs, then the Permittee must submit a Corrective Action Plan for this release from the SWMU(s) of concern which meets the requirements of Condition IV.C below for review and approval. This plan must be submitted within 120 days of the date that the notification identified in Condition IV.B.13.d is received by the Permittee.
15. If the Agency's notification identified in Condition IV.B.13.d above requires that a longer term groundwater monitoring program be established for certain SWMUs, then the Permittee must submit such a plan within 120 days after receiving this notification. This plan must be developed in accordance with the general procedures set forth in Section IV.D.4 of Attachment E. The Agency's DLPC will approve, modify and approve or disapprove and provide comments to the Permittee as to corrections or modifications needed for the program.
  - a. Within sixty (60) days of receipt of such comments, the Permittee must modify the plan or submit a new plan for the Agency's approval.
  - b. Within thirty (30) days of the approval of the plan, the Permittee shall begin implementing the plan in accordance with the terms and schedule established in the plan.
  - c. Agency action on the groundwater monitoring plan will be subject to the appeal provisions of Sections 39(a) and 40(a) of the Illinois Environmental Protection Act.

C. CORRECTIVE ACTION REQUIREMENTS

If, in accordance with Conditions IV.B.9 and/or IV.B.13, it is determined that corrective actions must be taken in response to releases from any SWMU, then the Permittee shall develop a Corrective Action Plan (CAP). This plan must be submitted within 120 days after receipt of the notification from the Agency that corrective actions are necessary to protect human health and the environment from observed releases from SWMUs at the facility. The purpose of the CAP is to develop and evaluate corrective action alternative(s) and evaluate corrective action measure(s) which will satisfy the target cleanup objectives specified by the Agency's DLPC. The proposed corrective actions must be sufficient to protect human health and the environment from the observed release.

The Agency DLPC will approve, modify and approve, or disapprove and provide comments to the Permittee as to the corrections or modifications needed for the CAP. Within 60 days of receipt of such comments, the Permittee must modify the CAP or submit a new CAP for the Agency's DLPC approval. The Agency's DLPC approval of one or more of the corrective measure(s) will consider, at a minimum, performance, reliability, implementability, safety, human health and the environmental impact of the measure(s). The formal approval and incorporation of the selected corrective measure(s) into the Part B permit will be via the Class 2 Permit Modification procedures identified in 35 IAC 703.282. The Permittee shall begin implementing the selected corrective measure(s) according to the terms and schedule identified in the modified permit.

D. FINANCIAL ASSURANCE FOR CORRECTIVE ACTION

1. The Permittee shall prepare a cost estimate for the completion of any corrective measure(s) required under this permit, in order to provide financial assurance for completion of corrective action, as required under 35 IAC 724.201(b). Such a cost estimate will be based upon the cost of contamination investigations and assessments for the SWMU(s), and design, construction, operation, inspection, monitoring, and maintenance of the corrective measure(s) to meet the requirements of 35 IAC 724.201, Attachment E and this permit. This cost estimate must be submitted to the Agency's DLPC and revised according to the following schedule:

<u>Facility Submission</u>	<u>Due Date</u>
Initial Cost Estimate (with Workplan)	120 days after the RFI Phase I effective date of this permit
Revised Cost Estimate (with the initial submittal of each RFI Report)	Upon written Agency request

2. The Permittee shall demonstrate continuous compliance with 35 IAC 724.201 by providing documentation of financial assurance using a mechanism specified in 35 IAC 724.243, in at least the amount of the cost estimate required under Condition IV.D.1. The words "completion of corrective action" shall be substituted for "closure and/or post-closure", as appropriate in the financial instrument specified in 35 IAC 724.251. The documentation shall be submitted to the Agency's DLPC within 60 days after the submittal of the initial or revised cost estimates required under Condition IV.D.1. The Agency's DLPC may accept financial assurance for completion of corrective action in combination with another financial mechanism that acceptable under 35 IAC 724.246 at its discretion.

E. FUTURE RELEASES FROM SWMUs

Whenever the Permittee becomes aware that any SWMU, that was not found to be releasing hazardous waste or hazardous constituents during the RFI, or was not addressed under the corrective action requirements of this permit, may have started to release hazardous waste or hazardous constituents, the Permittee shall report this information to the Agency's DLPC in writing within thirty (30) days of discovery. Upon the Agency's written request, the Permittee shall determine the nature and extent of the contamination by following the procedures set forth in Conditions IV.B through IV.D, beginning on the date of notification, rather than on the effective date of the permit.

F. NOTIFICATION REQUIREMENTS FOR AN ASSESSMENT OF NEWLY-IDENTIFIED SOLID WASTE MANAGEMENT UNIT(S)

1. The Permittee shall notify the Agency's DLPC in writing of any newly-identified SWMU(s) discovered during the course of groundwater monitoring, field investigations, environmental audits, or other means, no later than sixty (60) calendar days after discovery. The notification shall provide the following information, if available:
  - a. The location of the newly-identified SWMU in relation to other SWMUs on a scaled map or drawing;
  - b. The type and past and present function of the unit;
  - c. The general dimensions, capacities, and structural description of the unit (available drawings and specifications provided);
  - d. The period during which the unit was operated;
  - e. The specifics on all materials, including but not limited to, wastes and hazardous constituents, that have been or are being managed at the SWMU, to the extent available; and
  - f. The results of any relevant available sampling and analysis which may aid in determining whether releases of hazardous wastes or hazardous constituents have occurred or are occurring from the unit.
2. If the submitted information demonstrates a potential for a release of hazardous waste or hazardous waste constituents from the newly identified SWMU, the Agency's DLPC may request in writing, that the Permittee prepare a Solid Waste Management Unit (SWMU) Assessment

Plan and a proposed schedule of implementation and completion of the Plan for any additional SWMU(s) discovered subsequent to the issuance of this Permit.

3. Within 120 calendar days after receipt of the Agency's DLPC request for a SWMU Assessment Plan, the Permittee shall prepare a SWMU Assessment Plan consistent with the requirements of IV.B through IV.D above. This SWMU Assessment plan must also propose investigations, including field investigations if necessary, to determine the release potential to specific environmental media for the newly-identified SWMU. The SWMU Assessment Plan must demonstrate that the sampling and analysis program, if applicable, is capable of yielding representative samples and must include parameters sufficient to identify migration of hazardous waste and hazardous constituents from the newly-discovered SWMU(s) to the environment.
4. After the Permittee submits the SWMU Assessment Plan, the Agency's DLPC shall either approve, approve with conditions or disapprove the Plan in writing. If the plan is approved, the Permittee shall begin to implement the Plan within forty-five (45) calendar days of receiving such written notification. If the Plan is disapproved, the Agency's DLPC shall notify the Permittee in writing of the Plan's deficiencies specify a due date for submittal of a revised plan.
5. The Permittee shall submit a report documenting the results of the approved SWMU Assessment Plan to the Agency's DLPC in accordance with the schedule in the approved SWMU Assessment Plan. The SWMU Assessment Report shall describe all results obtained from the implementation of the approved SWMU Assessment Plan.

G. COMPLETION OF CORRECTIVE ACTION

1. The Permittee shall complete those corrective actions contained in the Corrective Action Plan approved in accordance with Condition IV.C above. The Permittee may request the Agency's DLPC to consider corrective action complete at any point during compliance with this permit. The petition should include a demonstration of the following:
  - a. The Permittee shall demonstrate that there have been no releases of hazardous waste or hazardous constituents to any media from the SWMUs; or
  - b. The Permittee shall demonstrate that all releases of hazardous waste or hazardous constituents to all media targeted within the RFI for investigation have been remediated to the target cleanup

objectives specified within the approved Corrective Measures Plan, and shall also describe how releases will be prevented in the future; or

- c. Some combination of the above demonstrations.

Appropriate documentation and certification must accompany such a demonstration.

The Permittee shall be notified in writing if the Agency's DLPC approves the request that the corrective actions can be considered complete. The notification from the Agency's DLPC to the Permittee may include a release from the financial requirements of Condition F above.

- 2. A determination of no further action shall not preclude the Agency's DLPC from requiring continued or periodic inspections of the SWMU(s) or continued or periodic monitoring of the specified environmental media when site-specific circumstances indicate that releases of hazardous wastes including hazardous constituents are likely to occur, if necessary to protect human health and the environment. Any requirement for long-term groundwater monitoring may only be required at SWMUs where substantial soil contamination exists (as determined by the Agency) or at any SWMU which would meet the definition of a land disposal unit.
- 3. A determination of no further action shall not preclude the Agency's DLPC from requiring further investigations, studies, or remediation at a later date, if new information or subsequent analysis indicates a release or likelihood of a release from a SWMU at the facility that is likely to pose a threat to human health or the environment. In such a case, the Agency's DLPC shall initiate a permit modification to rescind the determination of no further action.

## SECTION V: STANDARD CONDITIONS

### GENERAL REQUIREMENTS

1. **EFFECT OF PERMIT.** The existence of a RCRA permit shall not constitute a defense to a violation of the Environmental Protection Act or Subtitle G, except for development, modification or operation without a permit. Issuance of this permit does not convey property rights or any exclusive privilege. Issuance of this permit does not authorize any injury to persons or property or invasion of other private rights, or infringement of state or local law or regulations. (35 IAC 702.181)
2. **PERMIT ACTIONS.** This permit may be modified, reissued or revoked for cause as specified in 35 IAC 703.270 through 703.273 and Section 702.186. The filing of a request by the Permittee for a permit modification or revocation, or a notification of planned changes or anticipated noncompliance on the part of the Permittee does not stay the applicability or enforceability of any permit condition. (35 IAC 702.146)
3. **SEVERABILITY.** The provisions of this permit are severable, and if any provision of this permit, or the application of any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances and the remainder of this permit shall not be affected thereby. (35 IAC 700.107)
4. **PERMIT CONDITION CONFLICT.** In case of conflict between a special permit condition and a standard condition, the special condition will prevail. (35 IAC 702.160)
5. **DUTY TO COMPLY.** The Permittee shall comply with all conditions of this permit except for the extent and for the duration such noncompliance is authorized by an emergency permit. Any permit noncompliance constitutes a violation of the Environmental Protection Act and is grounds for enforcement action; permit revocation or modification; or for denial of a permit renewal application. (35 IAC 702.141 and 703.242)
6. **DUTY TO REAPPLY.** If the Permittee wishes to continue an activity allowed by this permit after the expiration date of this permit, the Permittee must apply for a new permit at least 180 days before this permit expires, unless permission for a later date has been granted by the Agency. (35 IAC 702.142 and 703.125)
7. **PERMIT EXPIRATION.** This permit and all conditions herein will remain in effect beyond the permit's expiration date if the Permittee has submitted a timely, complete application (see 35 IAC 703.181-703.209) and through no fault of the Permittee the Agency has not issued a new permit as set forth in 35 IAC 702.125.



NEED TO HALT OR REDUCE ACTIVITY NOT A DEFENSE. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. (35 IAC 702.143)

9. DUTY TO MITIGATE. In the event of noncompliance with the permit, the permittee shall take all reasonable steps to minimize releases to the environment, and shall carry out such measures as are reasonable to prevent significant adverse impacts on human health or the environment. (35 IAC 702.144)
10. PROPER OPERATION AND MAINTENANCE. The Permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the Permittee to achieve compliance with the conditions of this permit. Proper operation and maintenance includes effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory, and process controls, including appropriate quality assurance procedures. This provision requires the operation of back-up or auxiliary facilities or similar systems only when necessary to achieve compliance with the conditions of the permit. (35 IAC 702.145)
11. DUTY TO PROVIDE INFORMATION. The Permittee shall furnish to the Agency, within a reasonable time, any relevant information which the Agency may request to determine whether cause exists for modifying, revoking and reissuing or terminating this permit, or to determine compliance with this permit. The Permittee shall also furnish to the Agency, upon request, copies of records required to be kept by this permit. (35 IAC 702.148)
12. INSPECTION AND ENTRY. The Permittee shall allow an authorized representative of the Agency, upon the presentation of credentials and other documents as may be required by law, to:
  - a. Enter at reasonable times upon the Permittee's premises where a regulated facility or activity is located or conducted, or where records must be kept under the conditions of this permit;
  - b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
  - c. Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this permit; and
  - d. Sample or monitor, at reasonable times, for the purposes of assuring permit compliance or as otherwise authorized by the appropriate Act, any substances or parameters at any location. (35 IAC 702.149)

13. MONITORING AND RECORDS. (35 IAC 702.150)

- a. Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity. The method used to obtain a representative sample of the waste must be the appropriate method from Appendix A of 35 IAC 721. Laboratory methods must be those specified in Test Methods for Evaluating Solid Waste: Physical/Chemical Methods, SW-846, latest versions; Methods for Chemical Analysis of Water and Wastes, EPA-600/4-79-020, latest versions; or an equivalent method, as specified in the approved Waste Analysis Plan or approved by the Agency.
- b. The Permittee shall retain records of all monitoring information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, copies of all reports and records required by this permit, and records of all data used to complete the application for this permit for a period of at least 3 years from the date of the sample, measurement, report or application. These periods may be extended by request of the Agency at any time. The permittee shall maintain records from all groundwater monitoring wells and associated groundwater surface elevations, for the active life of the facility, and for disposal facilities for the post-closure care period as well.
- c. Records of monitoring information shall include:
  - i. The date(s), exact place, and time of sampling or measurements;
  - ii. The individual(s) who performed the sampling or measurements;
  - iii. The date(s) analyses were performed;
  - iv. The individual(s) who performed the analyses;
  - v. The analytical technique(s) or method(s) used; and
  - vi. The result(s) of such analyses. (35 IAC 702.150)

14. REPORTING PLANNED CHANGES. The permittee shall give notice to the Agency as soon as possible of any planned physical alterations or additions to the permitted facility. For a new HWM facility, the permittee may not commence treatment, storage or disposal of hazardous waste; and for a facility being modified the permittee may not treat, store or dispose of hazardous waste in the modified portion of the facility, until:

- a. The permittee has submitted to the Agency by certified mail or hand delivery a letter signed by the permittee and a registered professional engineer stating that the facility has been constructed or modified in compliance with the permit; and
  - b.
    - 1. The Agency has inspected the modified or newly constructed facility and finds it is in compliance with the condition of the permit; or
    - 2. If, within 15 days of the date of submission of the letter in paragraph (a), the permittee has not received notice from the Agency of its intent to inspect, prior inspection is waived and the permittee may commence treatment, storage or disposal of hazardous waste. (35 IAC 703.244 and 702.152(a))
15. ANTICIPATED NONCOMPLIANCE. The Permittee shall give advance notice to the Agency of any planned changes in the permitted facility or activity which may result in noncompliance with permit requirements. For a new facility, the permittee shall not treat, store or dispose of hazardous waste; and for a facility being modified, the permittee shall not treat, store or dispose of hazardous waste in the modification portion of the facility, except as provided in Section 703.280, until:
- a. The permittee has submitted to the Agency by certified mail or hand delivery a letter signed by the permittee and a registered professional engineer stating that the facility has been constructed or modified in compliance with the permit; and
  - b. Either:
    - 1. The Agency has inspected the modified or newly constructed facility and finds it is in compliance with the conditions of the permit; or
    - 2. Within 15 days after the date submission of the letter in section a above, the permittee has not received notice from the Agency of its intent to inspect, the permittee may commence treatment, storage or disposal of hazardous waste.
- (35 IAC 702.152(b) and 703.247)
16. TRANSFER OF PERMITS. This permit is not transferable to any person except after notice to the Agency. The Agency may require modification of the permit to change the name of the permittee and incorporate such other requirements as may be necessary under the appropriate Act. (See Sections 703.260 and 703.270, in some cases modification is mandatory.) (35 IAC 702.152(c))

17. MONITORING REPORTS. Monitoring results shall be reported at the intervals specified in the permit. (35 IAC 702.152(d))
18. COMPLIANCE SCHEDULES. Reports of compliance or noncompliance with, or any progress reports on, interim and final requirements contained in any compliance schedule of this permit shall be submitted no later than specified in 35 IAC 702.162. (35 IAC 702.152(e))
19. TWENTY-FOUR HOUR REPORTING.
  - a. The Permittee shall report to the Agency any noncompliance with the permit which may endanger health or the environment. Any such information shall be reported orally within 24 hours from the time the Permittee becomes aware of the following circumstances. This report shall include the following:
    - i. Information concerning the release of any hazardous waste that may cause an endangerment to public drinking water supplies.
    - ii. Information concerning the release or discharge of any hazardous waste or of a fire or explosion at the HWM facility, which could threaten the environment or human health outside the facility.
  - b. The description of the occurrence and its cause shall include:
    - i. Name, address, and telephone number of the owner or operator;
    - ii. Name, address, and telephone number of the facility;
    - iii. Date, time, and type of incident;
    - iv. Name and quantity of material(s) involved;
    - v. The extent of injuries, if any;
    - vi. An assessment of actual or potential hazards to the environment and human health outside the facility, where applicable; and
    - vii. Estimated quantity and disposition of recovered material that resulted from the incident.

- c. A written submission shall also be provided within 5 days of the time the Permittee becomes aware of the circumstances. The written submission shall contain a description of the noncompliance and its cause; the period of noncompliance including exact dates and times and if the noncompliance has not been corrected; the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent recurrence of the noncompliance. The Agency may waive the five day written notice requirement in favor of a written report within fifteen days. (35 IAC 702.152(f) and 703.245(b))
20. OTHER NONCOMPLIANCE. The Permittee shall report all instances of noncompliance not otherwise required to be reported under Standard Conditions 17, 18, and 19, at the time monitoring reports, as required by this permit, are submitted. The reports shall contain the information listed in Standard Condition 19. (35 IAC 702.152(g))
21. OTHER INFORMATION. Where the Permittee becomes aware that it failed to submit any relevant facts in the permit application, or submitted incorrect information in a permit application or in any report to the Agency, the Permittee shall promptly submit such facts or information. (35 IAC 702.152(h))
22. REPORTING REQUIREMENTS. The following reports required by 35 Ill. Adm. Code 724 shall be submitted in addition to those required by 35 Ill. Adm. Code 702.152 (reporting requirements):
  - a. Manifest discrepancy report: if a significant discrepancy in a manifest is discovered, the permittee must attempt to reconcile the discrepancy with the waste generator or transporter. If the discrepancy is not resolved within 15 days after receiving the waste, the permittee must immediately submit to the Agency a letter describing the discrepancy and attempts to reconcile it and a copy of the manifest or shipping paper at issue. (35 IAC 724.172(b))
  - b. Unmanifested waste report: The permittee must submit to the Agency within 15 days of receipt of unmanifested waste an unmanifested waste report on EPA form 8700-13B. (35 IAC 724.176)
  - c. Annual report: an annual report must be submitted covering facility activities during the previous calendar year. (35 IAC 724.175)
23. SUBMITTAL OF REPORTS OR OTHER INFORMATION. All written reports or other written information required to be submitted by the terms of this permit shall be sent to:

Illinois Environmental Protection Agency  
Division of Land Pollution Control #24  
Planning and Reporting Section  
2200 Churchill Road  
Post Office Box 19276  
Springfield, Illinois 62794-9276

24. SIGNATORY REQUIREMENT. All permit applications, reports or information submitted to the Agency shall be signed and certified as required by 35 IAC 702.126. (35 IAC 702.151)
25. CONFIDENTIAL INFORMATION. Any claim of confidentiality must be asserted in accordance with 35 IAC 702.103 and 35 IAC 161.
26. DOCUMENTS TO BE MAINTAINED AT FACILITY SITE. The Permittee shall maintain at the facility, until closure is complete, the following documents and amendments, revisions and modifications to these documents:
  - a. Waste analysis plan as required by 35 IAC 724.113(b) and this permit.
  - b. Personnel training documents and records as required by 35 IAC 724.116(d) and this permit.
  - c. Contingency plan as required by 35 IAC 724.153(a) and this permit.
  - d. Closure plan as required by 35 IAC 724.212(a) and this permit.
  - e. Cost estimate for facility closure as required by 35 IAC 724.242(d) and this permit.
  - f. Operating record as required by 35 IAC 724.173 and this permit.
  - g. Inspection schedules as required by 35 IAC 724.115(b) and this permit.
27. WASTE MINIMIZATION. The Permittee shall certify at least annually that the Permittee has a program in place to reduce the volume and toxicity of hazardous waste that he generates to the degree determined by the Permittee to be economically practicable, and the proposed method of treatment, storage, or disposal is that practicable method currently available to the Permittee which minimizes the present and future threat to human health and the environment, in accordance with 35 IAC 724.173(b)(9).

#### GENERAL FACILITY STANDARDS

28. NOTICE OF WASTE FROM A FOREIGN SOURCE. The permittee who has arranged to receive hazardous waste from a foreign source must notify the Regional Administrator in writing at least four weeks in advance of the date the waste is expected at the facility. (35 IAC 724.112(a))
29. NOTICE OF WASTE FROM OFF-SITE. The Permittee who receives hazardous waste from an off-site source (except where the Permittee is also the generator), must inform the generator in writing that the permittee has the appropriate permits for, and will accept, the waste the generator is shipping. The Permittee must keep a copy of this written notice as part of the facility operating record. (35 IAC 724.112(b))
30. GENERAL WASTE ANALYSIS. The Permittee shall comply with the procedures described in the approved waste analysis plan. (35 IAC 724.113)
31. SECURITY. The Permittee shall comply with the security provisions of 35 IAC 724.114(b) and (c).
32. GENERAL INSPECTION REQUIREMENTS. The Permittee shall follow the approved inspection schedule. The Permittee shall remedy any deterioration or malfunction discovered by an inspection as required by 35 IAC 724.115(c). Records of inspections shall be kept as required by 35 IAC 724.115(d).
33. PERSONNEL TRAINING. The Permittee shall conduct personnel training as required by 35 IAC 724.116 and shall maintain training documents and records as required by 35 IAC 724.116(d) and (e).
34. GENERAL REQUIREMENTS FOR IGNITABLE, REACTIVE, OR INCOMPATIBLE WASTE. The Permittee shall comply with the requirements of 35 IAC 724.117.

#### PREPAREDNESS AND PREVENTION

35. DESIGN AND OPERATION OF FACILITY. The Permittee shall maintain and operate the facility to minimize the possibility of fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment. (35 IAC 724.131)
36. REQUIRED EQUIPMENT. The Permittee shall equip the facility with the equipment set forth in the approved contingency plan, as required by 35 IAC 724.132.

37. TESTING AND MAINTENANCE OF EQUIPMENT. The Permittee shall test and maintain the equipment specified in condition 36 as necessary to assure its proper operation in time of emergency. Such testing and maintenance activities are set forth in the approved inspection schedule. (35 IAC 724.133)
38. ACCESS TO COMMUNICATIONS OR ALARM SYSTEM. The Permittee shall maintain access to the communications or alarm system as required by 35 IAC 724.134.
39. REQUIRED AISLE SPACE. The Permittee shall maintain aisle space as required by 35 IAC 724.135 and National Fire Protection Association (NFPA) requirements.
40. ARRANGEMENTS WITH STATE AND LOCAL AUTHORITIES AND EMERGENCY RESPONSE CONTRACTORS. The Permittee shall attempt to make emergency response arrangements with State and local authorities and agreements with State emergency response teams and emergency response contractors and equipment suppliers as required by 35 IAC 724.137. If State or local officials refuse to enter in preparedness and prevention arrangements with the Permittee, the Permittee must document this refusal in the operating record.

#### CONTINGENCY PLAN

41. IMPLEMENTATION OF PLAN. The provisions of the contingency plan must be carried out by the Permittee immediately whenever there is a fire, explosion or release of hazardous waste or hazardous waste constituents which could threaten human health or the environment (35 IAC 724.151(b)). At a minimum, this includes any fire or explosion which occurs in an area where hazardous waste is being managed (treated, stored or disposed). Within 15 days of any incident that requires implementation of the contingency plan, the owner or operator must submit a written report to the Agency as required by 35 IAC 724.156(j).
42. COPIES OF PLAN. A copy of the contingency plan, including any revisions, must be maintained at the facility and submitted to all local police and fire departments, hospitals and state and local emergency response teams as required by 35 IAC 724.153.
43. AMENDMENTS TO PLAN. The Permittee shall review and immediately amend, if necessary, the contingency plan, as required by 35 IAC 724.154.
44. EMERGENCY COORDINATOR. A trained emergency coordinator shall be available at all times in case of an emergency as required by 35 IAC 724.155 and 724.156.



#### MANIFEST SYSTEM RECORD KEEPING AND REPORTING

45. MANIFEST SYSTEM. The Permittee shall comply with the manifest requirements of 35 IAC 724.171, 724.172 and 724.176.
46. OPERATING RECORD. The Permittee shall maintain a written operating record at the facility in accordance with 35 IAC 724.173.
47. ANNUAL REPORT. The Permittee shall prepare and submit an annual report to the Agency prior to March 1st of each year in accordance with the requirements of 35 IAC 724.175.

#### CLOSURE

48. PERFORMANCE STANDARD. The Permittee shall close the facility as required by 35 IAC 724.211 and in accordance with the approved closure plan.
49. AMENDMENT TO CLOSURE PLAN. The Permittee must amend the closure plan whenever there is a change in the expected year of closure or whenever a change in the facility operation plans or facility design affects the closure plan pursuant to 35 IAC 724.212(c).
50. NOTIFICATION OF CLOSURE. The Permittee shall notify the Agency at least 60 days prior to the date it expects to begin closure. (35 IAC 724.212(d))
51. TIME ALLOWED FOR CLOSURE. After receiving the final volume of hazardous waste, the Permittee shall treat or remove from the site all hazardous waste and complete closure activities in accordance with the schedule(s) specified in the closure plan. (35 IAC 724.213)
52. DISPOSAL AND/OR DECONTAMINATION OF EQUIPMENT. When closure is completed, the Permittee shall decontaminate and/or dispose of all facility equipment and structures as required by the approved closure plan (35 IAC 724.214).
53. CERTIFICATION OF CLOSURE. When closure is completed, the Permittee shall submit certification to the Agency in accordance with 35 IAC 724.215 that the facility has been closed as specified by the approved closure plans.
54. COST ESTIMATE FOR FACILITY CLOSURE. The Permittee's original closure cost estimate, prepared in accordance with 35 IAC 724.242, must be:

- a. Adjusted for inflation either 60 days prior to each anniversary of the date on which the first closure cost estimate was prepared or if using the financial test or corporate guarantee, within 30 days after close of the firm's fiscal year.
  - b. Revised whenever there is a change in the facility's closure plan increasing the cost of closure.
  - c. Kept on record at the facility and updated. (35 IAC 724.242)
55. FINANCIAL ASSURANCE FOR FACILITY CLOSURE. The Permittee shall demonstrate compliance with 35 IAC 724.243 by providing documentation of financial assurance, as required by 35 IAC 724.251, in at least the amount of the cost estimates required by the previous Permit Condition. Changes in financial assurance mechanisms must be approved by the Agency pursuant to 35 IAC 724.243.
56. LIABILITY REQUIREMENTS. The Permittee shall demonstrate continuous compliance with the requirements of 35 IAC 724.247 and the documentation requirements of 35 IAC 724.251.
57. IN CAPACITY OF OWNERS OR OPERATORS, GUARANTORS, OR FINANCIAL INSTITUTIONS. The Permittee shall comply with 35 IAC 724.248 whenever necessary.

#### LAND DISPOSAL RESTRICTIONS

58. DISPOSAL PROHIBITION. Any waste identified in 35 IAC Part 728, Subpart C, or any mixture of such a waste with nonrestricted wastes, is prohibited from land disposal unless it meets the standards of 35 IAC Part 728, Subpart D, or unless it meets the requirements for exemptions under Subpart C. "Land disposal" means placement in or on the land and includes, but is not limited to, placement in a landfill, surface impoundment, waste pile, injection well, land treatment facility, or vault intended for disposal.
59. DILUTION PROHIBITION. The Permittee shall not in any way dilute a restricted waste or residual from treatment of a restricted waste as a substitute for adequate treatment in order to achieve compliance with 35 IAC 728, Subpart D (35 IAC 728.103).
60. WASTE ANALYSIS.
1. The Permittee must test his waste or extract developed, using the test method identified in Appendix I of 40 CFR Part 268, or use knowledge of the waste, to determine if the waste is restricted from land disposal.

2. For any waste with treatment standards expressed as concentrations in the waste extract, the Permittee must test the treatment residues or an extract of such residues developed using the test method described in Appendix I of 40 CFR Part 268, to assure that the treatment residues or extract meet the applicable treatment standard.
3. If the treatment residues do not meet the treatment standards, or if the Permittee ships any restricted wastes to a different facility, the Permittee shall comply with the requirements applicable to generators in 35 IAC 728.107 and 728.150(a)(1).

#### 61. STORAGE RESTRICTIONS

1. The Permittee shall not store hazardous wastes restricted from land disposal under 35 IAC Part 728, Subpart C unless such wastes are stored only in containers or tanks, and are stored solely for the purpose of the accumulation of such quantities as is necessary to facilitate proper recovery, treatment, or disposal, and: (1) each container is clearly marked to identify its contents and the date each period of accumulation begins; (2) each tank is clearly marked to identify its contents, the quantity of each hazardous waste received, and the date each period of accumulation begins, as required by 35 IAC 728.150 or such information is recorded and maintained in the operating records at the facility.
2. The Permittee must comply with the operating record requirements of 35 IAC 724.173.

#### 62. NEW DETERMINATIONS OF PROHIBITED WASTES

Wastes which are prohibited from land disposal under 35 IAC Part 728, Subpart C, or for which treatment standards have been established under 35 IAC 728, Subpart D, subsequent to the date of issuance of this permit, shall be subject to the conditions number 58 through 61 above.

Attachment A

Wastes which can be accepted and  
Hazardous Waste Identification Numbers

ILD093862811

<u>Hazardous Waste No.</u>	<u>Description of Hazardous Waste</u>
----------------------------	---------------------------------------

A. Characteristically hazardous waste

- |      |  |
|------|--|
| D001 | Solid waste that exhibits the characteristic of ignitability, but is not listed as a hazardous waste.    |
| D002 | Solid waste that exhibits the characteristic of corrosivity, but is not listed as a hazardous waste.     |
| D004 | Solid waste exhibiting the characteristic of TCLP toxicity for arsenic at 5.0 mg/1 or more.              |
| D005 | Solid waste exhibiting the characteristic of TCLP toxicity for barium at 100 mg/1 or more.               |
| D006 | Solid waste exhibiting the characteristic of TCLP toxicity for cadmium at 1.0 mg/1 or more.              |
| D007 | Solid waste exhibiting the characteristic of TCLP toxicity for chromium at 5.0 mg/1 or more.             |
| D008 | Solid waste exhibiting the characteristic of TCLP toxicity for lead at 5.0 mg/1 or more.                 |
| D009 | Solid waste exhibiting the characteristic of TCLP toxicity for mercury at 0.2 mg/1 or more.              |
| D010 | Solid waste exhibiting the characteristic of TCLP toxicity for selenium at 1.0 mg/1 or more.             |
| D011 | Solid waste exhibiting the characteristic of TCLP toxicity for silver at 5.0 mg/1 or more.               |
| D018 | Solid waste exhibiting the characteristic of TCLP toxicity for benzene at 0.5 mg/1 or more.              |
| D019 | Solid waste exhibiting the characteristic of TCLP toxicity for carbon tetrachloride at 0.5 mg/1 or more. |
| D021 | Solid waste exhibiting the characteristic of TCLP toxicity for chlorobenzene at 100.0 mg/1 or more.      |

- D022 Solid waste exhibiting the characteristic of TCLP toxicity for chloroform at 6.0 mg/l or more.
- D023 Solid waste exhibiting the characteristic of TCLP toxicity for o-cresol at 200.0 mg/l or more.
- D024 Solid waste exhibiting the characteristic of TCLP toxicity for m-cresol at 200.0 mg/l or more.
- D025 Solid waste exhibiting the characteristic of TCLP toxicity for p-cresol at 200.0 mg/l or more.
- D026 Solid waste exhibiting the characteristic of TCLP toxicity for cresol at 200.0 mg/l or more.
- D027 Solid waste exhibiting the characteristic of TCLP toxicity for 1,4 dichlorobenzene at 7.5 mg/l or more.
- D028 Solid waste exhibiting the characteristic of TCLP toxicity for 1,2 dichloroethane at 0.5 mg/l or more.
- D029 Solid waste exhibiting the characteristic of TCLP toxicity for 1,1 dichloroethylene at 0.7 mg/l or more.
- D030 Solid waste exhibiting the characteristic of TCLP toxicity for 2,4 dinitrotoluene at 0.13 mg/l or more.
- D032 Solid waste exhibiting the characteristic of TCLP toxicity for hexachlorobenzene at 0.13 mg/l or more.
- D033 Solid waste exhibiting the characteristic of TCLP toxicity for hexachlorobutadiene at 0.5 mg/l or more.
- D034 Solid waste exhibiting the characteristic of TCLP toxicity for hexachloroethane at 3.0 mg/l or more.
- D035 Solid waste exhibiting the characteristic of TCLP toxicity for methyl ethyl ketone at 200.0 mg/l or more.
- D036 Solid waste exhibiting the characteristic of TCLP toxicity for nitrobenzene at 2.0 mg/l or more.

- D037 Solid waste exhibiting the characteristic of TCLP toxicity for pentachlorophenol at 100.0 mg/1 or more.
- D038 Solid waste exhibiting the characteristic of TCLP toxicity for pyridine at 5.0 mg/1 or more.
- D039 Solid waste exhibiting the characteristic of TCLP toxicity for tetrachloroethylene at 0.7 mg/1 or more.
- D040 Solid waste exhibiting the characteristic of TCLP toxicity for trichloroethylene at 0.5 mg/1 or more.
- D041 Solid waste exhibiting the characteristic of TCLP toxicity for 2,4,5 trichlorophenol at 400.0 mg/1 or more.
- D042 Solid waste exhibiting the characteristic of TCLP toxicity for 2,4,6 trichlorophenol at 2.0 mg/1 or more.
- D043 Solid waste exhibiting the characteristic of TCLP toxicity for vinyl chloride at 0.2 mg/1 or more.

B. Hazardous wastes from non-specific sources

F002 The following spent halogenated solvents: tetrachloroethylene, methylene chloride, trichloroethylene, 1,1,1-trichloroethane, chlorobenzene, 1,1,2-trichloro-1,2,2-trifluoroethane, orthodichlorobenzene, trichlorofluoromethane, 1,1,2-trichloroethane, spent solvent mixtures and blends, and the still bottoms from the recovery of these spent solvents and spent solvent mixtures.

F003 The following spent non-halogenated solvents: xylene, acetone, ethyl acetate, ethyl benzene, ethyl ether, methyl isobutyl ketone, n-butyl alcohol, cyclohexanone, methanol, spent solvent mixtures and blends, and the still bottoms from the recovery of these spent solvents and spent solvent mixtures.

F004 The following spent non-halogenated solvents: cresols and cresylic acid, nitrobenzene, spent solvent mixtures and blends, and still bottoms from the recovery of these spent solvents and spent solvent mixtures.

F005 The following spent non-halogenated solvents: toluene, methyl ethyl ketone, carbon disulfide, isobutanol, pyridine, benzene, 2-ethoxyethanol, 2-nitropropane, spent solvent mixtures and blends, and the still bottoms from the recovery of these spent solvents and spent solvent mixtures.

Attachment B

Inspection Schedule

ILD093862811



Table I: General Inspection Schedule  
Security Devices

<u>ITEM</u>	<u>INSPECTION ELEMENT/TYPE OF PROBLEM</u>	<u>INSPECTION FREQUENCY</u>
Fence	Inspect entire perimeter for breaches or damage	Weekly
Gates	Check for proper gate lock function	Weekly
Warning Signs	Check for presence of warning signs	Monthly
Lighting System	Check lights for operability	Monthly

Table II: General Inspection Schedule,  
Safety & Emergency Equipment

Protective Gear (e.g., Helmets, Face Shields, Goggles, Boots, Gloves, Acid Resistant Clothing, Disposable Suits, Disposable Bags*)	Check accessibility	Monthly
	Check for adequate supply	Monthly
	Check for deterioration, damage	Monthly
First Aid Kits	Check accessibility	Monthly
	Check for adequate supply	Monthly
Emergency Showers	Check that units activate and shut off properly	Weekly
	Check accessibility	Weekly
Internal (Phone or Radio)/External (Phase) Communications Systems	Check accessibility	Weekly
	Check for operations	Monthly

<u>ITEM</u>	<u>INSPECTION ELEMENT/TYPE OF PROBLEM</u>	<u>INSPECTION FREQUENCY</u>
Fire Extinguishers	Check pressure gauge for full charge indication	Monthly
	Check inspection tag to insure annual maintenance by outside fire service is up-to-date	Monthly
	Check seal to ensure no one has used extinguisher	Monthly
	Check to ensure access to units is not blocked	Weekly
Absorbent Supply	Check for adequate supply	Weekly
Recovery Drums	Check for adequate supply	Weekly
Other Emergency and Decontamination Equipment	Check accessibility	Weekly
	Check for adequate supply	Monthly
	Check for deterioration/damage	Monthly
Alternate power supply for alarm system	Check for disconnection or low charge	Monthly
Respirators and cartridges	Check for adequate supply	Monthly
Fire department pull stations	Check for operability and accessibility, location signs	Monthly

Table III: Tank Farms Inspection Schedule

Storage Tanks Containment Area	Check for evidence of spilled materials Each Operating Day
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<u>ITEM</u>	<u>INSPECTION ELEMENT/TYPE OF PROBLEM</u>	<u>INSPECTION FREQUENCY</u>
	. Check for cracks and gaps in, or damage to containment base, sumps and drains, and their coatings	Each Operating Day
	. Check for evidence of seepage outside containment (e.g. discoloration)	Each Operating Day
	. Check for debris, cleanup residue, improperly stored equipment	Each Operating Day.
Storage Tanks	. Inspect tank exterior for cracks, leaks, discoloration, and obvious deformation	Each Operating Day
	. Ultrasonic thickness test	Annually
	. Check tank integrity	Every 5 years
Access Hatches, Vents, and Sampling Ports	. Check for leaks	Each Operating Day
	. Check for damage	Day
Fill/Drain and Overflow Piping	. Inspect piping for leaks	Each Operating Day
	. Inspect valve seals for leaks	Each Operating Day
	. Check that handles are not bent or damaged	Each Operating Day
Liquid Levels	. Check if operators log book is up to date	Each Operating Day
	. Check tank liquid level indicators for operability	Each Operating Day

All Ancillary Equipment	Visual inspection for leaks	Each Operating Day
	Integrity assessment on equipment which cannot be inspected daily	Annually
Tank Truck loading/ Unloading Area	Check for evidence of spills or releases in unloading area	Each Operating Day
	Check for removal of spill absorbent and cleanup materials	Each Operating Day
	Check sump, grating and curbs for cracks or other damage	Each Operating Day
	Inspect hoses for deterioration or leakage	Each Operating Day

Table IV: Container Storage Area Inspection Schedule

<u>ITEM</u>	<u>INSPECTION ELEMENT/TYPE OF PROBLEM</u>	<u>INSPECTION FREQUENCY</u>
Container Storage	Inspect hose couplings and valves for leakage	Each Operating Day
	Inspect containment system for deterioration	Weekly
	Check for evidence of spilled material on slab, ramps, drains, sumps	Each Operating Day
	Check for removal of absorbent materials and cleanup rags	Each Operating Day
	Check for, cracks and gaps in, or damage to, containment bases, sump and drains and coatings	Weekly

	Check for erosion, uneven settlement, etc.	Weekly
	Check for corrosion of grating over drains and sumps	Weekly
	Check for condition and availability of overpack containers	Weekly
Stored Containers	Check for drum leaks or swelling	Each Operating Day
	Check that drums are not open	Each Operating Day
	Check for proper placement	Each Operating Day
	Check adequacy of aisle space	Each Operating Day
	Check height of stacks	Each Operating Day
	Check capacity not exceeded	Each Operating Day
	Check for proper labeling	Each Operating Day

ATTACHMENT C  
CLOSURE CERTIFICATION FORM  
ILD093862811

This statement is to be completed by both the responsible officer and by the registered professional engineer upon completion of closure. Submit one copy of the certification with original signatures and three additional copies.

Closure Certification Statement

The hazardous waste management TOI units at the facility described in this document have been closed in accordance with the specifications in the approved closure plan. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

\_\_\_\_\_  
USEPA ID Number

\_\_\_\_\_  
Facility Name

\_\_\_\_\_  
Signature of Owner/Operator

\_\_\_\_\_  
Name and Title

\_\_\_\_\_  
Signature of Registered P.E.

\_\_\_\_\_  
Name of Registered P.E. and Illinois  
Registration Number

\_\_\_\_\_  
Date

ATTACHMENT D  
ADDITIONAL SPECIAL CONDITIONS

ILD093862811



## ADDITIONAL SPECIAL CONDITIONS

### I. Pre-Acceptance Analysis

The waste analysis at this facility shall be conducted in accordance with the waste analysis plan identified in the approved application in accordance with the following modifications:

- a. Prior to receiving nonhazardous parts washer solvent from a generator for the first time, the permittee shall conduct a hazardous waste determination as required by 35 Ill. Adm. Code 722.111 to determine that the waste is not characteristically hazardous for flashpoint, cadmium, lead, carbon tetrachloride, tetrachloroethylene, and trichloroethylene. Total analyses may be substituted for TCLP analyses if the total concentration of the constituent is detected at a level below the regulatory level identified in 35 Illinois Administrative Code 721.124. In addition waste streams from 10% of the existing generators must be analyzed for the above constituents to insure the waste is not hazardous.
- b. Prior to receiving nonhazardous aqueous parts washer solution photofinishing waste, waste, used, or off-specification ink, and used sorbents (not containing waste oil) from a generator for the first time, the permittee shall conduct a hazardous waste determination as required by 35 Illinois Administrative Code 722.111 (complete TCLP analysis) to determine that the waste does not exhibit a characteristic of a hazardous waste. Total analyses may be substituted for TCLP analyses if the total concentration of a constituent detected is at a level below the regulatory level identified in 35 Illinois Administrative Code 724.124.
- c. Prior to receiving antifreeze from a generator for the first time, the permittee shall conduct a hazardous waste determination as required by 35 Illinois Administrative Code 722.111 (TCLP analysis) to determine that the waste is not characteristically hazardous for perchloroethylene and lead. Total analyses may be substituted for TCLP analyses if the total concentration of a constituent detected is at a level below the regulatory level identified in 35 Illinois Administrative Code 724.124.
- d. The results of all pre-acceptance analysis must be reviewed prior to accepting the waste and included in this facility's operating record. The waste may not be accepted if the pre-acceptance analysis indicates:
  1. The waste is not permitted at this facility, or

2. The analysis indicates no final destination for the waste is available (i.e. the waste cannot be treated or disposed of at any of the facilities which Safety-Kleen has available to accept this waste.)
- e. All waste must be analyzed at the recycle centers in accordance with their waste analysis plan. A copy of the results of the analysis shall be included in the facility's operating record within 60 days after the date the waste was shipped from this facility.

## II. Receipt Analysis

- A. The Permittee shall take one sample of immersion cleaner from every tenth generator that ships wastes to the Pekin Service Center and conduct flash point analysis on that sample. If the analysis indicates that, the new formula immersion cleaner (IC #699) is characteristically ignitable, the generator's shipment of new formula immersion cleaner (IC #699) that contained the ignitable new formula immersion cleaner (IC #699) shall be stored as ignitable.

In lieu of any flashpoint testing, the Permittee may store containers of new formula immersion clean (IC #699) as D001 waste in accordance with the conditions of the Permit.

- B. All used oil which contains greater than 1,000 ppm halogens which cannot be adequately rebuffed are hazardous wastes and must be handled accordingly (i.e., they cannot be processed into an on-specification or off-specification used oil fuel).
- C. The permittee is authorized to accept the wastes identified in Section I(B)(2) and Section II(B)(2) and (3) provided the generator complies with the following requirements:
  1. The waste is analyzed in accordance with the II.A. above with the acceptance criteria in the approved waste analysis plan;
  2. The waste is delivered by an Illinois licensed special waste hauler or an exempt hauler as defined in 35 Ill. Adm. Code 809.211; and
  3. The waste is accompanied by a manifest, if required.

The authorization number is no longer issued by this Agency. Therefore, you will no longer be required to identify the authorization number on the manifest when shipping waste as authorized by this permit.

### III. Reporting Requirements

- A. Any incident which requires implementation of the contingency plan shall be recorded in the facilities operating record in an incident log which is maintained in a distinct section of the facilities operating records. The incident log must include a copy of each incident report. The incident report must include, at a minimum, the waste management units involved in the incident, the cause of the release, measures taken to correct the situation and prevent a reoccurrence in addition to the information identified in the approved application.

### IV. Closure

- A. At least 180 days prior to closure of any hazardous waste management unit at this facility the permittee shall submit a closure plan modification to insure closure complies with the current Agency standards in effect at the time of closure.
- B. The permittee shall close the ancillary equipment to tank #1, (dumpster in the return and fill area) in accordance with the procedures in the approved permit application log number 96-M-36 dated June 8, 2000 with the following modification:
  - 1. The dumpster will be steam cleaned and triple rinsed until there are no visual signs of contamination; and
  - 2. The rinsate will be collected and drummed then managed as hazardous waste.
- C. The Permittee shall submit a closure report in accordance with Section II(J)(7) of this permit documenting the closure of the dumpster in the return and fill area.

### V. General Operating Requirements

- A. Within 60 days of the effective date of this permit, the Permittee shall submit a certification from a qualified, licensed, independent engineer that the 10,000 gallon horizontal tank and piping have been painted in accordance with the recommendations made by Questec Corporation in the installation assessment of the used antifreeze storage tank system dated April 14, 1993 and submitted as Exhibit D-8a of the approved permit application.

The Permittee shall not store antifreeze in this tank until the certification identified above is reviewed and approved by the Agency. The Agency shall inspect the tank and renew and respond to the certification within 30 days. If the Agency has not inspected the tank or responded to the certification within 30 days, Safety Kleen may deem certification approved.

- B. Storage of hazardous transfer wastes that have been stored on site for greater than ten days is prohibited. This activity is a violation of the RCRA Part B Permit. If such a violation occurred in each storage unit in which the hazardous transfer waste was stored, each unit in which the violation occurred would be required to obtain a RCRA permit or to undergo closure at that time.

## VI. Contingency Plan

- A. The contingency plan must be implemented whenever there is a fire, explosion or spill which involves hazardous waste or which occurs in areas where hazardous waste is treated or stored. This includes spills within the containment system. A spill is any release of material outside the permitted unit, into or outside of the containment system.
- B. The Permittee shall contact the local emergency response entities immediately after implementation of the contingency plan unless the spill is less than one pound of waste immersion cleaner, or 50 gallons of spent antifreeze or spent mineral spirits and it is immediately contained and cleaned up.
  - 1. The entities which must be notified include:
    - a. Police Department
    - b. Cincinnati Township Fire Department
    - c. Pekin Memorial Hospital
    - d. IESDA (IEMA)
    - e. National Response Center
    - f. DLPC, FOS -- Peoria Region (within 24 hours)
  - 2. The information which must be initially relayed to each entity includes:
    - a. The type of emergency (release, fire or explosion);
    - b. The type of wastes involved in the emergency and the approximate quantity involved;
    - c. An initial assessment of the conditions at the site; and whether outside help is needed to properly respond to the situation.
  - 3. If the Permittee is able to properly respond to the emergency without any aid from the entities identified in Condition 2.a above, the Permittee shall notify each of these entities that the emergency situation no longer exists once all required emergency response and cleanup activities have been completed.

C. Within 60 days of the effective date of this permit, the Permittee shall demonstrate to the Agency that the following information has been provided to the local fire department, the local police department and all other agencies identified in 35 IAC 724.153(b) (Note that this information must be provided to these entities to ensure the requirements of 35 IAC 724.137 are met):

1. A list of all hazardous wastes stored at the facility (generic name) including the USEPA hazardous waste number;
2. A scaled drawing showing the location of all hazardous waste management units at the facility and all other areas where waste is stored at the facility (such as loading/unloading areas, etc.). This scaled drawing must also identify the entrances to the facility, roads within the facility and possible evacuation routes;
3. A description of the types of waste stored at each hazardous waste management unit at the facility;
4. A description of the procedures used to handle waste at the facility;
5. An estimate of the quantity of the various types of waste which may be stored at the facility. An estimate of the typical inventory of wastes at the facility must also be included;
6. The following information regarding the properties of the wastes stored at the facility:

Name  
USEPA Hazardous Waste Number  
CAS Number  
IDLH  
TLVs (TLV-TWA, TLV-STEL, TLV-C)  
Boiling Point (if applicable)  
Vapor pressure at two temperatures  
NFPA Designation (flammable or combustible)  
Material Safety Data Sheets  
Other appropriate characteristics (such as reactive class, etc.)  
USDOT classification

This information may be provided through submission of Material Safety Data Sheets (MSDSs) or prequalification analyses, if a MSDS does not exist for a waste, for the wastes stored at the Facility. MSDSs and/or prequalification analyses will be maintained at the facility for wastes managed on a transfer basis.

7. An identification of the products of incomplete combustion associated with (1) flammable or combustible hazardous wastes stored at the facility and (2) wastes stored at the facility which are hazardous due to the characteristic of ignitability (D001).
- D. Within sixty (60) days of the effective date of this permit the Permittee shall provide documentation to the Agency that the agreements and arrangements identified below have been made. Where necessary, documentation must be provided that any agency identified in 35 IAC 724.153(b) declined to enter an agreement or arrangement. The specific arrangements and agreements which must be made include:
1. Arrangements to familiarize the local police department, local fire departments and other local emergency response teams with the layout of the facility, properties of hazardous wastes handled at the facility and associated hazards, places where facility personnel would normally be working, entrances to and roads inside the facility and possible evacuation routes.
  2. Agreements designating primary emergency authority to a specific police department and a specific fire department, where more than one police department and fire department might respond to an emergency. Agreements should also be made with the other surrounding police and fire departments to provide support to the primary emergency authorities;
  3. Agreements with state emergency response teams, emergency response contractors and equipment suppliers;
  4. Arrangements to familiarize local hospitals with the properties of the hazardous wastes handled at the facility and the types of injuries or illnesses which could result from fires, explosions or releases at the facility;
  5. Arrangements to identify a single local emergency response agency as the primary agency which will coordinate activities required by these agencies during an emergency at the facility.

The facility should also attempt to develop emergency plans and coordination agreements with the state and local emergency entities identified above. The detail of the arrangements made with the local and state emergency entities will be dependent upon the types of waste handled at the facility and the potential need for the services of the various entities.

- E. The Permittee shall attempt to review all components of the contingency plan with the local emergency response entities within 12 months of the effective date of the permit and each year afterwards. Copies of the meeting notes and list of attendees shall be placed in the facility's operating record and be available to the Agency for review upon verbal or written request. Any response or nonresponse by a local emergency response entity to meet shall be documented in the facility's operating record.
- F. Within ninety (90) days of effective date of this permit, the Permittee shall update the closure cost estimate for each permitted container storage unit and each tank storage unit to account for analyzing all sweepings and washwater and rinsate generated during closure.

#### VII. Corrective Action

- A. The Agency review of the Corrective Action Plan will be subject to the appeal provisions contained in Section 40 of the Illinois Environmental Protection Act.

#### VIII. Financial Assurance

Financial assurance for the amount identified in Attachment G shall be submitted within 30 days of the effective date of this permit.

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ATTACHMENT E

REQUIRED SCOPE OF WORK FOR A RCRA  
FACILITY INVESTIGATION

ILD093862811



Scope of Work for a RCRA Facility Investigation  
Safety-Kleen Systems, Inc.  
ILD093862811  
LPC #1790600011  
Part B Log #96

This Scope of Work relates specifically to the RCRA Facility Investigation (RFI) of the solid waste management units identified in Section IV of this RCRA Permit, which the Permittee is required to perform under the terms of their RCRA permit. In this Scope of Work, "Agency's DLPC" refers to the Illinois Environmental Protection Agency's Division of Land Pollution Control, "Permittee" refers to Safety Kleen Systems, Inc. and "SWMU" refers to Solid Waste Management Unit.

I. PURPOSE

The purpose of the RFI is to determine the nature and extent of releases of hazardous waste or hazardous constituents, if any, from SWMUs located at the facility and to gather data necessary to prepare a Corrective Action Plan (CAP). Specifically, the information gathered during the RFI will be used to help determine the need, scope and design of a corrective action program.

II. SCOPE OF WORK

The Scope of Work for the RFI is divided into three phases -- Phase I, II and III.

1. The purpose of Phase I is to provide information on the characteristics and integrity of each unit and conduct field activities, as necessary, to determine if a SWMU has released, is currently releasing, or has the potential to release hazardous waste and/or hazardous constituents to the soil or air which may be impacted for that SWMU.
2. Phase II of the RFI will be required if the Agency's DLPC determines from the data obtained in Phase I that, for any SWMU, (1) a release has occurred to the soil or air, (2) a release is occurring to the soil or air, or (3) the results are inconclusive. The purpose of Phase II is to define the extent of releases to the soil or air from these SWMUs.
3. Phase III will be required if the Agency's DLPC determines from the data obtained in Phase II that hazardous wastes or hazardous constituents may have migrated to the groundwater. The purpose of Phase III is to define the extent of releases both on-site and off-site to the ground water from SWMUs identified in Phase I or II to have potentially released hazardous waste or hazardous constituents to the groundwater.

Each phase of the investigation is divided into three subparts. The first subpart deals with the development of a RFI Workplan by the Permittee. The second subpart is the implementation of the RFI. The final subpart covers the submission of reports of activities and results of the RFI.

### III. RFI WORKPLANS

The Permittee shall prepare a detailed workplan for each phase of the RFI which contains detailed background information related to the facility and the SWMUs listed in Condition B.1 of Section IV of the permit and which describes procedures for each phase of the RFI in accordance with the schedule in Section IV of the permit. The RFI Workplan must, at a minimum, contain the information identified in III.A-III.H below. The information in the workplan must be presented in a manner which is similar to the format set forth in these sections. Information provided in each Phase of the RFI may be incorporated into the workplan for the subsequent Phase by reference. Information already submitted in the Part B permit application may also be incorporated by reference into the workplans when appropriate.

#### A. GENERAL FACILITY INFORMATION

The following information must be provided (to the extent known) in the Phase I RFI Workplan regarding the facility overall:

1. A description of the facility, including the nature of its business, both past and present. This description should identify (1) the size and location of the facility, (2) the raw materials used and products manufactured at the facility, and (3) the Standard Industrial Code which describes the type of activities carried out at the facility;
2. Identification of past and present owners;
3. A discussion of the facility's past and present operations, including solid and hazardous waste generation, storage, treatment and disposal activities;
4. A brief discussion of each of the SWMUs identified in Condition B.1 of Section IV of this permit;
5. A description of all significant surface features (ponds, streams, depressions, etc.) and wells within 1,500 feet of the facility;

6. A description of all land usage within 1,500 feet of the facility, including all known SWMUs;
7. Identification of all human populations and environmental systems susceptible to contaminant exposure from releases from the SWMUs within a distance of at least 1,500 feet of the facility;
8. A description of any interim corrective action measures which were or are being planned or undertaken at the facility;
9. Approximate dates or periods of past spills or releases, identification of material spilled, amount spilled, location, and a description of the response actions, including any inspection reports or technical reports generated as a result of the spill or release.
10. A current topographic map(s) showing a distance of at least 1,500 feet around the facility and other information described below, and at a scale of one inch equal to not more than 200 feet. Contours shall be shown on the map, with the contour interval being sufficient to clearly show the pattern of surface water flow. If such a map is not available, the workplan shall describe the method for generating the map for inclusion in the Phase I report. The map shall clearly show the following:
  - a. Map scale, North arrow, date, and location of facility with respect to Township, Range and Section;
  - b. Topography and surface drainage depicting all waterways, wetlands, 100-year floodplain, drainage patterns, and surface water areas;
  - c. Property lines, with the owners of all adjacent property clearly indicated;
  - d. Surrounding land use;
  - e. Locations and boundaries of (1) all solid waste, including hazardous waste, management units, both past and present, (2) spill areas and (3) other suspected areas of contamination;
  - f. All injection and withdrawal wells; and
  - g. All buildings, tanks, piles, utilities, paved areas, easements, rights-of-way, and other features including all known past and present product and waste underground tanks or piping.

The map(s) shall be of sufficient detail and accuracy to locate and report all current and future RFI work performed at the site. The base map(s) shall be submitted in the Phase I report and modified in subsequent reports and workplans as appropriate.

B. NATURE AND EXTENT OF CONTAMINATION

The Phase I Workplan must contain the following information, to the extent known, for each of SWMUs identified in Condition B.1 of Section IV of the permit:

1. Location of unit/area;
2. The horizontal and vertical boundaries of each unit/area;
3. Details regarding the construction, operation and structural integrity of each unit/area;
4. A description of all materials managed and/or disposed at each SWMU including, but not limited to, solid waste, hazardous wastes, and hazardous constituents to the extent they are known or suspected over the life of the facility including:
  - (a) Type of waste or hazardous constituents placed in the units, including source, hazardous classification, quantity and chemical composition;
  - (b) Physical and chemical characteristics, including physical form, physical description, general chemical class, and cohesiveness of the waste;
5. Quantities of solid and hazardous wastes managed by the unit;
6. The history of the utilization of each SWMU and the surrounding areas, including the period of operation and age of the unit;
7. Methods used to close the unit, if applicable;
8. All available data and qualitative information on the level of contamination present at the SWMU;
9. A description of the existing degree and extent of contamination at each unit area;
10. Identification of additional information which must be gathered regarding 1 thru 9 above;

C. ADMINISTRATIVE OUTLINE

The Permittee shall submit as part of each Phase Workplan a general outline defining the RFI objectives, technical approach, and scheduling of tasks during that phase of the RFI. The Permittee shall prepare a Project Management Plan as part of each Phase Workplan which will include a discussion of the technical approach, schedules, budget, and personnel. The Project Management Plan must also include a description of the qualifications of personnel performing or directing the RFI, including contractor personnel. This plan shall also document the overall management approach to the current Phase of the RFI.

D. SITE-SPECIFIC SAMPLING PLANS

The Permittee shall prepare detailed site-specific sampling plans for each phase of the RFI which address all field activities needed to obtain site-specific data. The plans must contain: a statement of sampling objectives, specifications of equipment, analyses of interest, sample types, sample locations and schedules for sampling. Wherever appropriate, Test Methods for Evaluating Solid Wastes, Third Edition, (SW-846), including Final Update I, sampling, analysis, and statistical methods shall be utilized. The plans must address all levels of the investigations, as well as types of investigations conducted on specific environmental media (i.e., soil, air, surface water, groundwater). The plans must describe in detail how each phase of the RFI will be implemented.

1. Phase I Sampling and analysis Plan

The Phase I Sampling and Analysis Plan must describe methods to determine whether any of the SWMUs to be investigated have released or are currently releasing hazardous waste or hazardous constituents into the environment. This Phase I Sampling Plan shall be submitted as part of the RFI Phase I Workplan. The workplan must contain procedures for a:

a. Soils Investigation

The Phase I Workplan must provide for a determination of the presence or absence of releases of hazardous waste and hazardous constituents into the soil around and under each SWMU which must be investigated, based upon the information present in the Phase I Work Plan. To meet this requirement, the workplan must identify:

- (1) The procedures which will be used to describe and characterize the soils in and around the subject SWMU(s) down to the water table, including, but not limited to the following:
  - (a) Unified soil classification;
  - (b) Soil profile; and
  - (c) Elevation of water table;
- (2) The parameters and hazardous constituents to be used to establish the presence or absence of a plume of contamination. These must include, but are not limited to, specific hazardous constituents of wastes known or suspected to have been managed by the SWMU(s) as identified and determined by the unit characterization information presented in the work plan;
- (3) The basis for selecting the parameters and constituents in (3) above;
- (4) The methodology for choosing sampling locations, depths, and numbers of samples;
- (5) Sampling procedures for each parameter or constituent to be analyzed. All soil samples taken must be handled in accordance with 40 CFR 261, Appendix III and the Agency's DLPC soil volatile sampling procedure if volatiles are to be analyzed. All other environmental media samples must be collected and handled in accordance with EPA approved and standardized methods for evaluation of solid wastes;
- (6) Analytical methods to be used in the analysis of the samples. If any of these methods is not consistent with those specified in Test Methods for Evaluating Solid Waste, Physical/Chemical Methods (U.S. EPA SW-846), a complete description of the methods to be used and the justification for not using the appropriate SW-846 methods must be provided, and
- (7) Procedures and criteria for evaluating analytical results to establish the presence or absence of any contamination.

2. Phase II Sampling and analysis Plan

The Phase II Sampling and Analysis plan, if necessary, must describe procedures to determine the nature and extent of hazardous waste and/or hazardous constituents released to the soil. This workplan shall address and/or include, at a minimum:

- (1) A description of what is known about the horizontal and vertical extent of contamination;
- (2) A description of relevant contaminant and environmental chemical properties within the affected source area and plume, including solubility, specific absorption, leachability, exchange capacity biodegradability, hydrolysis, photolysis, oxidation and other factors that might affect contaminant migration and transformation (if known);
- (3) Specific contaminant concentrations, if known;
- (4) The horizontal and vertical velocity and direction of contaminant movement (if known);
- (5) An extrapolation of future contaminant movement (if known);
- (6) The methods and criteria to be used to define the boundaries of the plume(s) of contamination;
- (7) The parameters and constituents to be used to establish the presence or absence of a plume of contamination. This must include, but need not be limited to, specific hazardous constituents of wastes known or suspected to have been placed in the SWMUs;
- (8) The basis for selecting the parameters and constituents in 7 above;
- (9) The methodology for choosing sampling locations depths, and numbers of samples;
- (10) Sampling procedures for each parameter or constituent to be analyzed;
- (11) Analytical methods to be used in the analysis of the samples. If any of these methods are not identical to those specified in Test Methods for Evaluation Solid Waste. Physical/Chemical Methods, (US EPA SW-846), a complete description of the methods to be used and the justification for not using the SW-846 methods shall be provided; and

- (12) Procedures and criteria for evaluating analytical results to establish the presence or absence of any plume of contamination.

3. Potential Receptors

If (1) a release to air or groundwater is detected, or (2) the Permittee desires to establish site-specific soil cleanup objectives, then the subsequent RFI Phase Report must provide data describing the human populations and environmental systems within a radius of 1,500 feet of the facility boundary that may be affected by releases from SWMUs must be collected and submitted to the Agency. The following characteristics shall be identified.

- a. Local uses and possible future uses of groundwater:
  - (1) type of use (e.g. municipal or residential drinking water source, industrial, etc.); and
  - (2) location of groundwater users, including wells and discharge areas.
- b. Local uses and possible future uses of surface waters draining from the facility:
  - (1) Domestic and municipal;
  - (2) Recreational;
  - (3) Agricultural;
  - (4) Industrial; and
  - (5) Environmental.
- c. Human use of, or access to, the facility and adjacent lands, including, but not limited to:
  - (1) Recreation;
  - (2) Agriculture;
  - (3) Residential;
  - (4) Commercial;



- (5) Zoning; and
  - (6) Location between population locations and prevailing wind direction.
- d. A description of the biota in surface water bodies on, adjacent to, or affected by the facility.
  - e. A description of ecology of, and adjacent to the facility.
  - f. A demographic profile of the people who use or have access to the facility and adjacent land, including, but not limited to: age, sex, and sensitive subgroups.
  - g. A description of any endangered or threatened species near the facility.
4. Phase III - Hydrogeologic and Hydrologic Investigation

The potential for releases to groundwater from a given SWMU must be investigated as part of Phase III of the RFI if the Agency's DLPC determines from the data obtained during the RFI Phase II investigation that releases to soil from a given SWMU may have migrated to the groundwater below the site, or the data is inconclusive. The RFI Phase III hydrogeologic and geologic investigation plan must provide descriptions of groundwater monitoring systems which will provide adequate data on the detection, nature, extent and rate, and concentration of any releases to groundwater or surface water.

Groundwater monitoring will not be required for a SWMU during the RFI Phase III investigation, if the Permittee can demonstrate, based upon the data obtained from the soils investigation under the RFI Phase I environmental media investigation that no releases have occurred from the SWMU(s), or, based upon the data obtained from the rate and extent evaluation under the RFI Phase II investigation that contaminants from the subject SWMU(s) have not entered the groundwater. The Agency reserves the right to require a groundwater monitoring program for SWMUs based upon interim or final corrective measures chosen, provided that the corrective measures call for on-site final disposition of contamination or long term remedial activities.

If releases of hazardous waste or hazardous constituents have entered the groundwater at a particular SWMU, the RFI Phase III Workplan shall address a hydrological investigation and groundwater monitoring for a SWMU or group of SWMUs at the time the Agency notifies the Permittee that a RFI Phase III Workplan is required. This workplan must include:

- a. Information, as it is available, regarding:
- (1) The regional geologic and hydrogeologic characteristics in the vicinity of the facility, including stratigraphy, hydrogeologic flow and the areas of recharge and discharge;
  - (2) Any topographic or geomorphic features that might influence the groundwater flow system;
  - (3) The hydrogeologic properties of all of the hydrogeologic units found at the site down to the first bedrock aquitard, including: hydraulic conductivity and porosity, texture, uniformity and lithology; and interpretation of hydraulic interconnections between saturated zones; and zones of significant fracturing or channeling in the unconsolidated and consolidated deposits;
  - (4) Using the facility map as a base, isopach and structural contour maps, and at least two (2) geologic cross sections showing the extent (depth, thickness, lateral extent) of all hydrogeologic units within the facility boundary, down to the first bedrock aquitard, identify: all units in the unconsolidated and consolidated deposits; zones of higher permeability or lower permeability that might direct or restrict the flow of contaminants; perched aquifers; and the first saturated zone that may have a potential for migration of contaminants;
  - (5) The water level or fluid pressure monitoring, including: water level contour maps and vertical gradient sections, well or piezometer hydrographs and interpretation of the gradient sections, well or piezometer hydrographs and interpretation of the flow system, interpretation of any changes in hydraulic gradients, and seasonal fluctuation; and
  - (6) Any man-made influences that may affect the hydrogeology of the site, identifying local water supply and production wells and other man-made hydraulic structures within 1500 feet of the facility boundary.
- b. Procedures for obtaining information identified in III.D.4.a above which was not obtained during preparation of the workplan.

- c. Documentation that sampling and analysis of groundwater monitoring wells will be carried out in accordance with the approved Data Collection Quality Assurance Plan as required in III.F. below. The plan shall provide information on the design and installation of all groundwater monitoring wells. The designs shall be in accordance with the latest version of the Technical Enforcement Guidance Document (TEGD) where appropriate, and the latest version of the Agency's DLPC design criteria. At a minimum:
  - (1) The groundwater monitoring wells must consist of monitoring wells installed in the uppermost aquifer and in each underlying aquifer (e.g., sand units) which are hydraulically interconnected;
  - (2) At least one background monitoring well in each aquifer shall be installed hydraulically upgradient (i.e., in the direction of increasing static head) from the limit of the SWMUs, except to the extent that SWMUs in close proximity can be investigated with the same background well system. The number, locations, and depths must be sufficient to yield groundwater samples that are: (a) representative of background quality in the uppermost aquifer and units hydraulically interconnected beneath the facility; and (b) not affected by SWMUs at the subject facility; and
  - (3) Monitoring wells in each appropriate aquifer shall be installed hydraulically downgradient (i.e., in the direction of decreasing static head) at the limit of the SWMU or at the limit of each group of proximate SWMUs. Their number, locations and depths must ensure that they allow for detection of releases of hazardous waste or hazardous constituents from the SWMU(s).
- d. A sampling plan which specifies:
  - (1) The parameters and constituents to be used to establish the presence or absence of a plume of contamination. These must include, but need not be limited to, specific hazardous constituents of wastes determined to have been placed in or released from the SWMUs (including any possible degradation products);
  - (2) The basis for selecting the parameters and constituents in (1) above;
  - (3) The methodology for investigating the hydrostratigraphic units at site, and the locations, depths, and concentration specifications for each monitoring well;

- (4) Sampling procedures for each parameter or constituent to be analyzed, including sampling frequency;
- (5) Analytical methods to be used in the analysis of the samples. If any of these methods is not consistent with those specified in Test Methods for Evaluating Solid Waste, Physical/Chemical Methods (U.S. EPA SW-846), a complete description of the methods to be used and the justification for not using the appropriate SW-846 methods shall be provided; and
- (6) Procedures and criteria for evaluating analytical results to establish the presence or absence of any plume of contamination.

If the Agency's DLPC determines from the data obtained during the Phase III investigation that releases of hazardous waste or hazardous constituents have occurred to the groundwater or that the data are inconclusive, the Permittee will be required to submit a Groundwater Monitoring Plan to determine the vertical and horizontal distribution of the contaminants identified and to produce the long-term disposition of the contaminants. This groundwater monitoring program will require proposals for establishing the locations, depths, and construction specifications for additional monitoring wells necessary to delineate the extent of any plume. The methodology of the investigation, the sampling procedures, analytical methods, and procedures for evaluating analytical results to establish the extent of the plume shall be the same as above unless specifically identified in the Phase III workplan. The Groundwater Monitoring Plan must also specify the criteria which will be used to determine the limits of the plume.

#### E. DATA COLLECTION QUALITY ASSURANCE

The Permittee shall prepare a plan to document all monitoring procedures, sampling, field measurements, and sample analysis performed during the investigation so as to ensure that all information, data and resulting decisions are technically sound, statistically valid, and properly documented. This shall be submitted with each Phase Workplan.

Quality Assurance. Sampling methods and equipment, as well as laboratory analytical methods, shall follow guidance in U.S. EPA's SW-846, "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods" (see 40 CFR 260.11) if appropriate. All field sampling methods not included in SW-846 must be approved by the Agency's DLPC before they are used in the RFI. This includes methods such as drilling, borings,

etc. When applicable, standard procedures, as defined by U.S. EPA, IEPA or ASTM, should be followed. All soil samples which are to be taken must be handled in accordance with 40 CFR, Part 261, Appendix III and the Agency's soil volatile sampling procedures if volatile sampling is required. The analytical methods which will be used must be specified and must be approved by the Agency before they are implemented.

F. DATA MANAGEMENT PLAN

The Permittee shall develop and initiate a Data Management Plan to document and track investigation data and results. This Plan shall identify and set up data documentation materials and procedures, project file requirements, and project-related progress reporting procedures and documents. The Plan shall also provide the format to be used to present the raw data and conclusions of the investigation(s). This plan shall be submitted with each Phase Workplan.

G. IMPLEMENTATION OF INTERIM MEASURES

At any time during the RFI the Permittee may initiate interim measures for the purpose of preventing continuing releases and/or mitigating the results of releases and/or mitigating the migration of hazardous wastes or hazardous constituents. It shall not be necessary to conduct all phases of the RFI investigation if the Agency's DLPC and the Permittee agree that a problem can be corrected, or a release cleaned up, without additional study and/or without a formal CMS.

The Permittee shall submit information on any past or ongoing interim measures which have been or are to be undertaken to abate threats to human health and the environment to the Agency's DLPC for approval. This information shall include, at a minimum:

1. Objectives of the interim measures: how the measure is mitigating a potential threat to human health and the environment and/or is consistent with and integrated into any long term solution at the facility;
2. Design, construction, and maintenance requirements;
3. Schedules for design and construction; and
4. Schedules for progress reports.

If the Agency's DLPC determines that a release cannot be addressed without additional study and/or a formal CMS then the Agency's DLPC will notify the Permittee that

these must be performed. Any proposal made under this provision or any other activity resulting from such proposal, including the invocation of dispute resolution, shall not affect the schedule for implementation of the RFI or of any other portion of the permit.

If the Agency determines that interim measures are necessary to protect human health or the environment, the Permittee will be notified by way of a permit modification.

#### H. HEALTH AND SAFETY PLAN

Under the provisions of 29 CFR 1910 (54 FR 9,295, March 6, 1989), cleanup operations must meet the applicable requirements of OSHA's Hazardous Waste Operations and Emergency Response standard. These requirements include hazard communication, medical surveillance, health and safety programs, air monitoring, and decontamination and training. General site workers engaged in activities that expose or potentially expose them to hazardous substances must receive a minimum of 40 hours of safety and health training off site plus a minimum of three days of actual field experience under the direct supervision of a trained experienced supervisor. Managers and supervisors at the cleanup site must have at least an additional eight hours of specialized training on managing hazardous waste operations. These requirements must be met during each phase of the RFI.

#### IV. IMPLEMENTATION OF RFI

The Permittee shall conduct those investigations necessary to characterize the site, and to determine the nature, rate and extent of migration, and concentrations of hazardous waste and hazardous constituents, if any, released from the SWMU's into the surface water and sediments, groundwater, air, and soil. The investigations must be of adequate technical content to support the development and evaluation of a corrective action program, if one is deemed necessary by the Agency's DLPC.

The investigation activities shall follow the plans and procedures set forth in the Workplan(s) and the RFI schedule. Any actual or anticipated deviations from the Workplan(s) or the RFI schedule shall be reported no later than the time of submission of the next quarterly report required by Section V subsequent to the determination of need or actual deviation from the Workplan.

#### V. SUBMISSION OF REPORTS AND RESULTS OF RFI ACTIVITIES

The Permittee must prepare and submit quarterly progress reports and a final report on the activities and results of each Phase of the RFI activities as appropriate. The progress reports shall contain at a minimum:

1. An estimate of the percentage of the investigation completed;
2. Summary of activities completed during the reporting period;
3. Summaries of all actual or proposed changes to the Workplan or its implementation;
4. Summaries of all actual or potential problems encountered during the reporting period;
5. Proposal for correcting any problems;
6. Projected work for the next reporting period; and
7. Other information or data as requested in writing by the Agency's DLPC.

The workplans and reports which must be submitted to the Agency for review and approval in accordance with the schedule set forth in the following table:

<u>Facility Action</u>	<u>Due Date</u>
Submission of RFI Phase I Workplan	Within 120 days after effective date of the permit
Completion of RFI Phase I investigation and submission of Phase I Report and Summary	To be specified in the Phase I Workplan
Submission of RFI Phase II Workplan	Within 90 days after notification of the need of Phase II by Agency's DLPC
Completion of RFI Phase II investigation and submission of Phase II Report and Summary	To be specified in the Phase II workplan
Submission of RFI Phase III Workplan	Within 90 days after notification of the need for Phase III
Completion of RFI Phase III investigation and submission of Phase III Report and Summary	To be specified in the Phase III Workplan
Periodic Progress Reports	To be specified in workplans

ATTACHMENT F

APPROVED RCRA PERMIT APPLICATION IDENTIFICATION

ILD093862811



Approved RCRA Permit Application Identification  
Safety-Kleen Systems, Inc. (Pekin Service Center)  
ILD093862811

<u>Section</u>	<u>Approved Section Edition</u>
A. Part A Application	5/13/93
B. Facility Description	4/26/93
C. Waste Characteristics	4/26/93
D. Process Information	4/26/93
E. Groundwater Monitoring	4/26/93
F. Procedures to Prevent Hazards	4/26/93
G. Contingency Plan	4/26/93
H. Personnel Training	4/26/93
I. Closure and Post-Closure Requirements	4/26/93
J. Other Federal Laws	4/26/93
K. Part B Certification (Technical Data)	4/26/93
L. Continuing Releases at Permitted Facilities	4/26/93
M. Research Development and Demonstration Permits	4/26/93

<u>Attachments</u>	<u>Agency Reception Date of Approved Version</u>
Figure B-1 Handling Process for Spent Parts Washer Solvent	4/26/93
Figure B-2 Solvent Use and Regeneration Loop	4/26/93
Figure B-2a Unit Process for Handling Bulk Antifreeze Waste	4/26/93
Figure B-3 Unit Process for Handling Waste Containers	4/26/93
Figure B-4 Topographic Map	4/26/93
Figure B-5 Existing Site Plan	4/26/93
Figure B-5a Topographic Site Plan	4/26/93
Figure B-6 1967 Zoning Map	4/26/93
Figure B-7 Pekin Municipal Well Locations	4/26/93
Figure B-8 Wind Rose - Peoria, Illinois	4/26/93
Figure B-9 Geological Structural Features of Tazewell County	4/26/93
Figure B-10 Floodplain Map	4/26/93
Figure B-11 Traffic Pattern for Antifreeze Tank	4/26/93
Figure B-12 Traffic Pattern for 4-Pack Tank Farm	4/26/93
Figure B-13 Traffic Pattern for Metal Shelters	4/26/93
Figure B-14 Traffic Pattern for Container Warehouse	4/26/93
Figure B-14a Traffic Pattern for Return/Fill Shelter	4/26/93
Figure B-14b Traffic Pattern for Transfer Trailer	4/26/93
Figure B-15 Topographic Details Within 1000 Feet	4/26/93
Exhibit B-1 FRS Wastes	4/26/93
Exhibit B-2 Blank Operating Log	4/26/93
Exhibit B-3 Completed Operating Log	4/26/93
Exhibit B-4 Well Logs for Surrounding Wells	4/26/93
Exhibit B-5 Permit to Use V.F.W. Road	4/26/93
Table B-1 Summary of Municipal Wells in Pekin, Illinois	4/26/93
Exhibit C-1 Analyses MSDS, and Product Specifications for Spent Parts, Washer Solvent Waste, and Analyses of Parts Washer Solvent Dumpster Sediment	4/26/93

<u>Attachments</u>	<u>Agency Reception Date of Approved Version</u>
Exhibit C-2     Analyses and MSDS for Spent Immersion Cleaner	4/26/93
Exhibit C-3     Analyses, MSDS, and Product Specifications for Dry Cleaner Wastes	4/26/93
Exhibit C-4     Analyses and MSDS for Paint Wastes	4/26/93
Exhibit C-5     LDR Notification Form	4/26/93
Exhibit C-6     Analyses and MSDS for Spent Antifreeze	4/26/93
Exhibit C-6a    Waste Antifreeze TCLP Data	4/26/93
Exhibit C-7     Quality Control Procedures	4/26/93
Exhibit C-8     Waste Acceptance Criteria	4/26/93
Table C-1       Parameters and Rationale for Hazardous Waste Analyses	4/26/93
Table C-2       Parameters and Test Methods	4/26/93
Table C-3       Methods Used to Sample Hazardous Wastes	4/26/93
Table C-4       Frequency of Analysis	4/26/93
Table C-5       Examples of Potentially Incompatible Wastes	4/26/93
Figure D-1       Example of Typical Corns Pump	4/26/93
Figure D-2       Typical Container Label	4/26/93
Figure D-3       Drum Washer Schematic and Details	4/26/93
Figure D-4       Example Warehouse Pallet Layout	4/26/93
Figure D-5       Example Flammable Storage Shelter Pallet and Drum Layout	4/26/93
Figure D-6       Warehouse Plan and Details	4/26/93
Figure D-7       Flammable Storage Shelter	4/26/93
Figure D-B       4-Pack Tank Farm and Return/Fill Piping Plan	4/26/93
Figure D-9       Used Parts Washer Solvent 20,000 Gallon Vertical Storage Tank	4/26/93
Figure D-10      Environmental Piping Schematic for Used Parts Washer Solvent	4/26/93
Figure D-11      Used Antifreeze 10,000 Gallon Horizontal Storage Tank	4/26/93
Figure D-12      Environmental Piping Schematic for Used Antifreeze	4/26/93

<u>Attachments</u>	<u>Agency Reception Date of Approved Version</u>
Figure D-13 Horizontal Tank Piping Plan	4/26/93
Figure D-14 Used Antifreeze Horizontal Tank Concrete Plan & Details	4/26/93
Figure D-15 Used Parts Washer Solvent Dumpster	4/26/93
Figure D-16 Return/Fill Shelter	4/26/93
Figure D-17 Tank Farm Tank Access Container	4/26/93
Figure D-18 Used Antifreeze Tank Access Container	4/26/93
Figure D-19 4-Pack Tank Farm Plan & Details	4/26/93
Figure D-20 Moorman Bros. Tank Gauge Details	4/26/93
Figure D-21 Used Parts Washer Solvent High Level Alarm System Diagram	4/26/93
Figure D-22 Horizontal Tank Level Gauge	4/26/93
Figure D-23 Used Antifreeze High Level Alarm System Diagram	4/26/93
Exhibit D-1 Specifications for Rust Inhibiting Drum Coating	4/26/93
Exhibit D-2 Polyethylene Drum Fluorination	4/26/93
Exhibit D-3 Example Epoxy Coating Technical Data	4/26/93
Exhibit D-4 Example of Typical Wet/Dry Vacuum Cleaner Specifications	4/26/93
Exhibit D-5 Engineering Assessment of Tank Farm	4/26/93
Exhibit D-5a Tank Construction Materials	4/26/93
Exhibit D-6 Engineering Assessment of Parts Washer Solvent Dumpster	4/26/93
Exhibit D-7 Engineering Assessment of the Container Storage Areas	4/26/93
Exhibit D-7a Container Storage Area Assessment, September 1992	4/26/93
Exhibit D-8 Design Engineering Assessment of Used Antifreeze Tank System	4/26/93
Exhibit D-8a Installation Assessment of Used Antifreeze Tank System	4/26/93
Exhibit D-9 Secondary Containment Photographs	4/26/93
Exhibit D-10 Waste Streams and Containers Specifications	4/26/93

<u>Attachments</u>		<u>Agency Reception Date of Approved Version</u>
Exhibit D-11	Safety-Kleen Systems, Inc. Specifications for Storage Containers	4/26/93
Exhibit D-12	Typical Epoxy Sealant Specifications	4/26/93
Exhibit D-13	Secondary Containment Calculations	4/26/93
Exhibit D-14	Typical Drum Pallet Configurations	4/26/93
Exhibit D-15	Container Storage Area Secondary Containment Photos, February 1993	4/26/93
Figure F-1	Emergency Equipment Plan	4/26/93
Figure F-2	Tank and Container Setback Plan	4/26/93
Exhibit F-1	Inspection Log for Drum Storage Areas - Example	4/26/93
Exhibit F-2	Inspection Log for Storage Tank System - Example	4/26/93
Exhibit F-3	Inspection Log for Safety and Emergency Equipment	4/26/93
Exhibit F-4	Inspection Lists and Diagrams for Pumps, Valves and Flanges	4/26/93
Exhibit F-5	Determination of Water Supply	4/26/93
Exhibit F-6	Fire Protection Adequacy, November 1992	4/26/93
Table F-1	Emergency Equipment List	4/26/93
Table F-2	Facility Inspection Frequency	4/26/93
Attachment G-1 Most Recent Coordination Letters4/26/93		
Figure G-1	Existing Site Plan	4/26/93
Figure G-2	Emergency Equipment Plan	4/26/93
Figure G-3	Safety-Kleen Systems, Inc. Field Spill Report Form	4/26/93
Figure G-4	Emergency Evacuation Routes	4/26/93
Exhibit G-1	Pekin Service Center Emergency Information	4/26/93
Exhibit G-2	Material Safety Data Sheets	4/26/93
Exhibit G-3	Remedial Contractor Qualifications	4/26/93

<u>Attachments</u>	<u>Agency Reception Date of Approved Version</u>
Exhibit G-4 Exposure Modeling Scenarios	4/26/93
Exhibit G-5 Archie Model Input Parameters (Downwind Air Dispersion Modeling)	4/26/93
Table G-1 Employee Functions During an Emergency	4/26/93
Table G-2 Emergency Equipment List	4/26/93
Table G-3 Hazardous Waste Physical Characteristics	4/26/93
Table G-4 Emergency Response Criteria - Indoor Release	4/26/93
Table G-5 Emergency Response Criteria - Indoor Fire	4/26/93
Exhibit H-1 Employee Titles and Job Descriptions	4/26/93
Exhibit H-2 Trainer Resumes	4/26/93
Exhibit H-3 Example Training Record	4/26/93
Exhibit H-4 Level of Training for Hazardous Waste Personnel	4/26/93
Exhibit H-5 Contingency Plan Training for Alternate Emergency Coordinators	4/26/93
Exhibit H-6a Standard Operating Procedures for Coliwasa Sampling for Waste Drums	4/26/93
Exhibit H-6b Standard Operating Procedures for the Determination of Specific Gravity	4/26/93
Table H-1 Branch Manager Training Outline	4/26/93
Table H-2 Introductory and Annual Training Topics for Facility Employees	4/26/93
Table H-2a New Employee Orientation/Training Outline	4/26/93
Table H-3 Example Periodic Training Topics	4/26/93
Table H-4 Example Emergency Response Training Topics	4/26/93
Exhibit I-1 Soil Sampling Plan Outline	4/26/93
Exhibit I-2 Closure Schedule	4/26/93
Exhibit I-3 Notice in Deed of Hazardous Waste Activity on Property	4/26/93
Exhibit I-4 Pekin, Illinois Facility Closure Cost Estimate	4/26/93
Exhibit I-5 Financial Assurance Mechanism for Closure	4/26/93

<u>Attachments</u>	<u>Agency Reception Date of Approved Version</u>
Exhibit 1-6     Hazardous Waste Facility Certificate of Liability Insurance	4/26/93
Exhibit J-1     Illinois Environmental Protection Agency Permit to Operate Emission Source	4/26/93
Exhibit K-1     Certification Statement - Pekin, Illinois Service Center	4/26/93
Exhibit K-2     Prior Conduct Certification Statement - Pekin, Illinois Service Center	4/26/93
Figure L-1     FRS Transfer Shelter	4/26/93
Exhibit L-1     Release History	4/26/93
Exhibit L-2     Example Used Oil Certification	4/26/93
Exhibit L-3     Example Prequalification Evaluation Customer Survey	4/26/93
Exhibit L-4     FRS Transfer Shelter Specifications	4/26/93

ATTACHMENT G

FINANCIAL ASSURANCE REQUIREMENTS

ILD093862811



	Amount of Waste <u>Allowed</u>	Financial Assurance Required  <u>For Unit</u>
Existing Tankage	28,500 gallons	\$57,042
Existing Container Storage Volume	<u>6,912 gallons</u>	<u>\$46,490</u>
	35,412 gallons	\$103,532

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## ADMINISTRATIVE RECORD INDEX

FACILITY : SAFETY-KLEEN CORPORATION - PEKIN SERVICE CENTER

I.D. # : ILD 093 862 811

ITEM NO	ITEM DATE	DESCRIPTION	ITEM FILED
1	2/16/88	SUBMITTAL OF PART B PERMIT APPLICATION	1
2	3/23/88	IEPA SENT N.O.D REGARDING PERMIT APPLICATION	1
3	11/3/88	RESPONSE OF N.O.D	1
4	12/21/88	IEPA SECOND N.O.D SENT TO COMPANY	1
5	1/11/90	LETTER FROM IEPA REGARDING CLOSURE PLAN MOD REQUEST.	1
6	12/21/90	SK NOTIFICATION OF FAILURE OF TANK TEST	1
7	3/16/90	CERCLA REPORT	1
8	3/27/90	REQUEST FOR A 10 DAY EXTENSION TO RESPOND TO N.O.D DATED 12/21/88	1
9	4/10/90	RESPONSE OF COMMENTS REGARDING LETTER FROM IEPA DATED 12/21/88	1
10	5/1/90	SUBMITTAL OF NOTICE OF DEED CERTIFICATION	1
11	5/24/90	DISAPPROVAL OF CLOSURE PLAN FOR HAZ. WASTE TANK SO2 STORAGE	1
12	7/18/90	SUBMITTAL OF REVISED ATTACHMENT H.	1
13	8/30/90	SUBMITTAL OF ATTACHMENT E	1
14	9/7/90	APPROVAL OF CLOSURE PLAN	1
15	10/11/90	NOTICE OF INTENT TO DENY PART B PERMIT	1
16	10/19/90	PUBLIC NOTICE	1
17	11/12/90	SUBMITTAL OF CLASS I MOD FOR CLOSURE PLAN	1
18	1/30/91	NOTIFICATION TO BEGIN THE TECH. REVIEW OF THE PART B APPLICATION	1
19	4/9/91	SUBMITTAL OF REVISED CLASS I MOD CLOSURE PLAN	1
20	4/15/91	LETTER FROM IEPA TO THE COMPANY REGARDING IEPA OBTAINING A CONTRACTOR TO REVIEW THE PART B APPLICATION	1
21	5/1/91	SUBMITTAL OF REVISED PART B PERMIT BY PRC, SK'S CONSULTING FIRM	1
22	5/29/91	USEPA LETTER TO THE COMPANY REGARDING SUBPARTS AA & BB	1
22A	6/28/92	RESPONSE FROM THE COMPANY RE. SUBPART AA & BB	1
23	7/3/91	IEPA PHONE LOG	1

## ADMINISTRATIVE RECORD INDEX

FACILITY : SAFETY-KLEEN CORPORATION - PEKIN SERVICE CENTER

I.D. # : ILD 093 862 811

ITEM NO	ITEM DATE	DESCRIPTION	ITE. FILED
24	7/3/91	ATKEARNY DRAFT TECH. REVIEW DELIVERABLE	1
25	7/5/91	ATKEARNY LETTER TO EPA'S PROJ. MANAGER	1
26	7/9/91	APPROVAL OF CLASS 1 MOD FOR CLOSURE PLAN	1
27	7/18/91	N.O.D. FROM IEPA SENT TO THE COMPANY REGARDING REVISED PART B	1
28	8/9/91	SCHEDULE FOR CLOSURE ACTIVITIES	1
29	8/27/91	NOTIFICATION OF POSSIBLE SUBSURFACE DEGRADATION	1
30	8/16/91	ATKEARNY TECH.REVIEW SUBPART BB DRAFT DELIVERABLE	1
31	10/19/91	PUBLIC NOTICE	1
32	10/14/91	CLOSURE PROGRESS REPORT	1
32B	10/21/91	PART B APPLICATION REVISION 2	1
33	3/11/92	RESPONSE TO SUBPART BB NOD	1
34	4/17/92	N.O.D RE. REVISED PART B	1
35	5/18/92	RESPONSE FROM IEPA TO THE COMPANY RE.SOIL SAMPLING	1
35B	5/29/92	RESPONSE OF NOD	1
36	7/20/92	SUBMITTAL OF PART A & REVISED PART B	1
37	7/31/92	SUBMITTAL OF ADDITIONAL TABLES G1, & G2	1
38	8/3/92	REVISION OF PAGE D-11 OF PART B	1
39	8/10/92	SUBMITTAL OF A MORE DETAILED ZONING MAP	1
40	8/26/92	SUBMITTAL OF COLOR PHOTOGRAPHS FOR EXHIBIT D-9	1
41	9/11/92	EMERGENCY RESPONSE SERVICES	1
42	11/4/92	MORE INFORMATION ON FIRE PROTECTION	1
43	11/5/92	ASSESSMENT REPORT ON THE CONTAINMENT SYSTEM	1
43B	11/18/92	ASSESSMENT OF CONTAINMENT SYSTEM	1
43C	12/11/92	FEDERAL DRAFT PERMIT	1
44	1/15/93	SUBMITTAL OF REVISED PART B APPLICATION	1
45	2/9/93	LETTER FROM SK TO IEPA RE. CLOSURE COST INFO.	1
46	2/26/93	ADDITIONAL CHANGES TO PART B APPLICATION	1
47	4/23/93	REVISED PART B APPLICATION	1
47A	5/12/93	REVISED PART A	1

# ADMINISTRATIVE RECORD INDEX

FACILITY : SAFETY-KLEEN CORPORATION - PEKIN SERVICE CENTER

I.D. # : ILD 093 862 811

ITEM NO	ITEM DATE	DESCRIPTION	ITEM FILED
48	5/28/93	SUBMITTAL OF REVISED CLOSURE COST ESTIMATE	1
49	6/22/93	PART B DRAFT PERMIT	1
50	6/29/93	PUBLIC NOTICE	1
51	8/11/93	CLOSURE AGREEMENT	1
52		RCRA FACILITY ASSESSMENT	1
53	9/7/93	PUBLIC INVOLVEMENT CHECKLIST	1
54	9/22/93	RESPONSE TO COMMENTS & FINAL FEDERAL PERMIT	1

§ 124.19 Appeal of RCRA, UIC, and PSD permits.

(a) Within 30 days after a RCRA, UIC, or PSD final permit decision (or a decision under § 270.29 to deny a permit for the active life of a RCRA hazardous waste management facility or unit) has been issued under § 124.15, any person who filed comments on that draft permit or participated in the public hearing may petition the Environmental Appeals Board to review any condition of the permit decision. Any person who failed to file comments or failed to participate in the public hearing on the draft permit may petition for administrative review only to the extent of the changes from the draft to the final permit decision. The 30-day period within which a person may request review under this section begins with the service of notice of the Regional Administrator's action unless a later date is specified in that notice. The petition shall include a statement of the reasons supporting that review, including a dem-

onstration that any issues being raised were raised during the public comment period (including any public hearing) to the extent required by these regulations and when appropriate, a showing that the condition in question is based on:

(1) A finding of fact or conclusion of law which is clearly erroneous, or

(2) An exercise of discretion or an important policy consideration which the Environmental Appeals Board should, in its discretion, review.

(b) The Environmental Appeals Board may also decide on its initiative to review any condition of any RCRA, UIC, or PSD permit issued under this part. The Environmental Appeals Board must act under this paragraph within 30 days of the service date of notice of the Regional Administrator's action.

(c) Within a reasonable time following the filing of the petition for review, the Environmental Appeals Board shall issue an order granting or denying the petition for review. To the extent review is denied, the conditions of the final permit decision become final agency action. Public notice of any grant of review by the Environmental Appeals Board under paragraph (a) or (b) of this section shall be given as provided in § 124.10. Public notice shall set forth a briefing schedule for the appeal and shall state that any interested person may file an amicus brief. Notice of denial of review shall be sent only to the person(s) requesting review.

(d) The Environmental Appeals Board may defer consideration of an appeal of a RCRA or UIC permit under this section until the completion of formal proceedings under subpart E or F relating to an NPDES permit issued to the same facility or activity upon concluding that:

(1) The NPDES permit is likely to raise issues relevant to a decision of the RCRA or UIC appeals;

(2) The NPDES permit is likely to be appealed; and

(3) *Either*: (i) The interests of both the facility or activity and the public are not likely to be materially adversely affected by the deferral; or

(ii) Any adverse effect is outweighed by the benefits likely to result from a consolidated decision on appeal.

(e) A petition to the Environmental Appeals Board under paragraph (a) of this section is, under 5 U.S.C. 704, a prerequisite to the seeking of judicial review of the final agency action.

(f)(1) For purposes of judicial review under the appropriate Act, final agency action occurs when a final RCRA, UIC, or PSD permit is issued or denied by EPA and agency review procedures are exhausted. A final permit decision shall be issued by the Regional Administrator:

(i) When the Environmental Appeals Board issues notice to the parties that review has been denied;

(ii) When the Environmental Appeals Board issues a decision on the merits of the appeal and the decision does not include a remand of the proceedings; or

(iii) Upon the completion of remand proceedings if the proceedings are remanded, unless the Environmental Appeals Board's remand order specifically provides that appeal of the remand decision will be required to exhaust administrative remedies.

(2) Notice of any final agency action regarding a PSD permit shall promptly be published in the FEDERAL REGISTER.

(g) Motions to reconsider a final order shall be filed within ten (10) days after service of the final order. Every such motion must set forth the matters claimed to have been erroneously decided and the nature of the alleged errors. Motions for reconsideration under this provision shall be directed to, and decided by, the Environmental Appeals Board. Motions for reconsideration directed to the administrator, rather than to the Environmental Appeals Board, will not be considered, except in cases that the Environmental Appeals Board has referred to the Administrator pursuant to § 124.2 and in which the Administrator has issued the final order. A motion for reconsideration shall not stay the effective date of the final order unless specifically so ordered by the Environmental Appeals Board.

# ADMINISTRATIVE RECORD INDEX

FACILITY : SAFETY-KLEEN CORPORATION - PEKIN SERVICE CENTER

I.D. # : ILD 093 862 811

ITEM NO	ITEM DATE	DESCRIPTION	ITEM FILED
24	7/3/91	ATKEARNY DRAFT TECH. REVIEW DELIVERABLE	1
25	7/5/91	ATKEARNY LETTER TO EPA'S PROJ. MANAGER	1
26	7/9/91	APPROVAL OF CLASS 1 MOD FOR CLOSURE PLAN	1
27	7/18/91	N.O.D. FROM IEPA SENT TO THE COMPANY REGARDING REVISED PART B	1
28	8/9/91	SCHEDULE FOR CLOSURE ACTIVITIES	1
29	8/27/91	NOTIFICATION OF POSSIBLE SUBSURFACE DEGRADATION	1
30	8/16/91	ATKEARNY TECH. REVIEW SUBPART BB DRAFT DELIVERABLE	1
31	10/19/91	PUBLIC NOTICE	1
32	10/14/91	CLOSURE PROGRESS REPORT	1
32B	10/21/91	PART B APPLICATION REVISION 2	1
33	3/11/92	RESPONSE TO SUBPART BB NOD	1
34	4/17/92	N.O.D RE. REVISED PART B	1
35	5/18/92	RESPONSE FROM IEPA TO THE COMPANY RE. SOIL SAMPLING	1
35B	5/29/92	RESPONSE OF NOD	1
36	7/20/92	SUBMITTAL OF PART A & REVISED PART B	1
37	7/31/92	SUBMITTAL OF ADDITIONAL TABLES G1, & G2	1
38	8/3/92	REVISION OF PAGE D-11 OF PART B	1
39	8/10/92	SUBMITTAL OF A MORE DETAILED ZONING MAP	1
40	8/26/92	SUBMITTAL OF COLOR PHOTOGRAPHS FOR EXHIBIT D-9	1
41	9/11/92	EMERGENCY RESPONSE SERVICES	1
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47A	5/12/93	REVISED PART A	1

## ADMINISTRATIVE RECORD INDEX

FACILITY : SAFETY-KLEEN CORPORATION - PEKIN SERVICE CENTER

I.D. # : ILD 093 862 811

ITEM NO	ITEM DATE	DESCRIPTION	ITEM FILED
1	2/16/88	SUBMITTAL OF PART B PERMIT APPLICATION	1
2	3/23/88	IEPA SENT N.O.D REGARDING PERMIT APPLICATION	1
3	11/3/88	RESPONSE OF N.O.D	1
4	12/21/88	IEPA SECOND N.O.D SENT TO COMPANY	1
5	1/11/90	LETTER FROM IEPA REGARDING CLOSURE PLAN MOD REQUEST.	1
6	12/21/90	SK NOTIFICATION OF FAILURE OF TANK TEST	1
7	3/16/90	CERCLA REPORT	1
8	3/27/90	REQUEST FOR A 10 DAY EXTENSION TO RESPOND TO N.O.D DATED 12/21/88	1
9	4/10/90	RESPONSE OF COMMENTS REGARDING LETTER FROM IEPA DATED 12/21/88	1
10	5/1/90	SUBMITTAL OF NOTICE OF DEED CERTIFICATION	1
11	5/24/90	DISAPPROVAL OF CLOSURE PLAN FOR HAZ. WASTE TANK SO2 STORAGE	1
12	7/18/90	SUBMITTAL OF REVISED ATTACHMENT H.	1
13	8/30/90	SUBMITTAL OF ATTACHMENT E	1
14	9/7/90	APPROVAL OF CLOSURE PLAN	1
15	10/11/90	NOTICE OF INTENT TO DENY PART B PERMIT	1
16	10/19/90	PUBLIC NOTICE	1
17	11/12/90	SUBMITTAL OF CLASS I MOD FOR CLOSURE PLAN	1
18	1/30/91	NOTIFICATION TO BEGIN THE TECH. REVIEW OF THE PART B APPLICATION	1
19	4/9/91	SUBMITTAL OF REVISED CLASS I MOD CLOSURE PLAN	1
20	4/15/91	LETTER FROM IEPA TO THE COMPANY REGARDING IEPA OBTAINING A CONTRACTOR TO REVIEW THE PART B APPLICATION	1
21	5/1/91	SUBMITTAL OF REVISED PART B PERMIT BY PRC, SK'S CONSULTING FIRM	1
22	5/29/91	USEPA LETTER TO THE COMPANY REGARDING SUBPARTS AA & BB	1
22A	6/28/92	RESPONSE FROM THE COMPANY RE. SUBPART AA & BB	1
23	7/3/91	IEPA PHONE LOG	1

# ADMINISTRATIVE RECORD INDEX

FACILITY : SAFETY-KLEEN CORPORATION - PEKIN SERVICE CENTER

I.D. # : ILD 093 862 811

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## ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276

JAMES R. THOMPSON CENTER, 100 WEST RANDOLPH, SUITE 11-300, CHICAGO, IL 60601

ROD R. BLAGOJEVICH, GOVERNOR

RENEE CIPRIANO, DIRECTOR

217/524-3300

June 24, 2003

CERTIFIED MAIL

7001 2510 0002 5277 3855

Mr. Matthew C. Sauvageau  
Environmental Compliance Manager  
Safety-Kleen Systems, Inc. (Pekin Facility)  
14249 VFW Road  
Pekin, Illinois 61554

Re: 1790600011 -- Cook County  
Safety-Kleen Systems, Inc. (Pekin Facility)  
ILD093862811  
RCRA Part B Log #B-96R  
RCRA Part B -- Administrative Record

Dear Mr. Sauvageau:

The Illinois Environmental Protection Agency (Illinois EPA) has reviewed your application for renewal of the RCRA permit to store hazardous waste. The application was dated May 1, 2003, and received May 1, 2003, for the above referenced facility. A list of deficiencies identified during the initial completeness review is included in the Notice of Deficiency (NOD) Attachment.

Each of the deficiencies must be addressed before the Illinois EPA can finish the completeness review of your application. Your response must be submitted in quadruplicate and postmarked no later than July 25, 2003. The response should be in a format, which allows incorporation of the new information into the appropriate sections of your application. To allow for a proper review of this new information, the location of the response to each deficiency should be identified in a list cross-referencing these items. Each revised page or drawing must have the revision date identified on them for tracking purposes.

A certification identical to that outlined in 35 Ill. Adm. Code 702.126 must accompany your submission. The original and three copies of the new information and certification should be submitted to the following address:

Illinois Environmental Protection Agency  
Bureau of Land -- #33  
Permit Section  
1021 North Grand Avenue East  
Springfield, Illinois 62794-9276

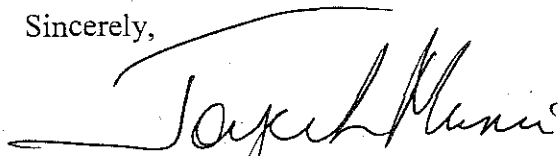
ROCKFORD - 4302 North Main Street, Rockford, IL 61103 - (815) 987-7760 • DES PLAINES - 9511 W. Harrison St., Des Plaines, IL 60016 - (847) 294-4000  
ELGIN - 595 South State, Elgin, IL 60123 - (847) 608-3131 • PEORIA - 5415 N. University St., Peoria, IL 61614 - (309) 693-5463  
BUREAU OF LAND - PEORIA - 7620 N. University St., Peoria, IL 61614 - (309) 693-5462 • CHAMPAIGN - 2125 South First Street, Champaign, IL 61820 - (217) 278-5800  
SPRINGFIELD - 4500 S. Sixth Street Rd., Springfield, IL 62706 - (217) 786-6892 • COLLINSVILLE - 2009 Mall Street, Collinsville, IL 62234 - (618) 346-5120  
MARION - 2309 W. Main St., Suite 116, Marion, IL 62959 - (618) 993-7200

USEPA

Page 2

If you have any additional questions in this matter, please contact Krishnamurthy S. Gadi of my staff at 217/524-3863.

Sincerely,

A handwritten signature in black ink, appearing to read "Joyce L. Munie". The signature is fluid and cursive, with a long horizontal line extending from the end of the name.

Joyce L. Munie, P.E.  
Manager, Permit Section  
Bureau of Land

JLM:KSG:bjh\031944s.doc

cc: Jim Blough, USEPA  
Gordon Poquette, Tazewell County Health Dept.

Attachment

Safety-Kleen Systems, Inc. (Pekin Service Center)

State ID1790600011

ILD093862811

RCRA Log #B-96R

Notice of Deficiency

Safety-Kleen failed to address the certification, confidentiality, and community relation's issues in its submittal. Each item of the decision guide must be addressed by furnishing the requested information. If an item is not applicable to the facility, indicate it as such and explain why it not applicable.

- 1) **Siting Certification: 703.184(f), Environmental Protection Act: Sections 39(c) & 39.2**  
All pollution facilities must demonstrate that they have complied with the requirements. Existing facilities must document that they have received siting approval for the operations proposed in this permit application or otherwise show how they have complied with the requirements of Section 39.2.
- 2) **Technical Information Certification: 703.182, Illinois Professional Engineering Act**  
All technical data, such as design drawings, specifications and engineering studies, must be certified (sealed) by a qualified Professional Engineer who is licensed to practice in the State of Illinois in accordance with Ill. Rev. Stat., par. 5101, Sec. 1 and par. 5119, Sec. 13.1.
- 3) **Prior Conduct Certification: Section 39 Environmental Protection Act**  
Applications must be accompanied by a completed and signed original copy of the Agency's prior conduct certification evaluation, as required under Section 39(i) of the Act.
- 4) **Public Disclosure Exemption Claims and Trade Secret Claims: Section 7 of the Act; 2 Ill. Adm. Code Part 1828; 35 Ill. Adm. Code Part 130**  
A completed and signed statement must accompany application.
- 5) **Public Participation: Environmental Protection Act, Section 39(d), 35 Ill. Adm. Code Part 703**  
All pollution facilities including existing facilities must demonstrate that they have complied with the requirements.

B-96

CC: Peoria/USEPA

DWC  
RAH

October 13, 1993

Ron Harmon  
Permit Section  
Division of Land Pollution Control  
Bureau of Land  
Illinois Environmental Protection Agency  
P.O. Box 19276  
2200 Churchill Road  
Springfield, Illinois 62794-9276

Re: 1790600011 - Tazewell County  
Safety-Kleen Corp.  
IL D093862811  
RCRA Permit Log No. 96  
RCRA Part B - Administrative Record

Dear Mr. Harmon:

We are writing with respect to the Part B permit issued to Safety-Kleen Corp. for its Pekin Service Center facility. As part of that permit issuance, the IEPA provided a summary of Safety-Kleen's comments on the draft Part B and the Agency's responses thereto. In certain instances, these responses indicate that language was included in the permit which was, in fact, not in the final Part B issued. Safety-Kleen is writing to ask that these errors be corrected.

- Safety-Kleen's Comment 8 sought certain changes in the permit language describing waste streams managed at the Pekin facility. In response to that comment, the Agency stated that Condition I.B.2 had been changed through the elimination of the word "only" in the sixth line of the provision. That change was not made in the actual permit provision.

RECEIVED

OCT 14 1993

IEPA-EOL  
PERMIT SECTION

- Comment 34 sought the elimination of the specified "hydrostatic" testing from the permit since such testing is not required under the regulations. The Agency's response to that comment was that the permit provision had been written to allow Safety-Kleen to select other testing methods, as long as the alternative method was approved by the Agency. The permit language does not provide that flexibility however.
- In Comment 48, Safety-Kleen sought a modification of the requirement to use Appendix A of 35 IAC 721 sampling methods in Section V.13(a). The Agency indicated that the requested change was made in the permit in its response to the Comment. However the change was not made to the second sentence of Section V.14(a) as requested and as indicated by the Agency it would be.
- Comment 57 dealt with the clarification of the term daily to each operating day. The Agency made the requested change in Table IV but did not do so in Table IV which deals with the inspections of the container storage areas. In the response to Safety-Kleen's comments, the IEPA stated that Safety-Kleen's position as to the container storage area inspections was accepted by the Agency. Table IV should therefore also be corrected.
- In Comment 23, Safety-Kleen sought the flexibility to test sweepings, and wash and rinse water from closure activities to see if they were hazardous. In its responses, the Agency agreed to allow the testing and did try to include permit language to that effect. However, as written the waters and sweepings are confused. The permit provisions need to be corrected.

Each of these items represents instances in which the Agency stated it would make a revision to the draft permit language which for some reason did not find its way into the final permit. With this letter, Safety-Kleen is asking that each of these errors be corrected.


Letter to Mr. Harmon

10/13/93

Page 3

If you have any questions with respect to these requests, please feel free to contact myself or Jennifer Jendras of Safety-Kleen.

Very truly,

  
Cynthia A. Tarka

CT:sam

cc: Brad Frost

smskpk12





B-94

CC: FOR. a/USFPA

DWC  
RAH

October 13, 1993

Ron Harmon  
Permit Section  
Division of Land Pollution Control  
Bureau of Land  
Illinois Environmental Protection Agency  
P.O. Box 19276  
2200 Churchill Road  
Springfield, Illinois 62794-9276

Re: 1790600011 - Tazewell County  
Safety-Kleen Corp.  
IL D093862811  
RCRA Permit Log No. 96  
RCRA Part B - Administrative Record

Dear Mr. Harmon:

We are writing with respect to the Part B permit issued to Safety-Kleen Corp. for its Pekin Service Center facility. As part of that permit issuance, the IEPA provided a summary of Safety-Kleen's comments on the draft Part B and the Agency's responses thereto. In certain instances, these responses indicate that language was included in the permit which was, in fact, not in the final Part B issued. Safety-Kleen is writing to ask that these errors be corrected.

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RECEIVED

OCT 14 1993

IEPA-DOE  
PERMIT SECTION

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Letter to Mr. Harmon

10/13/93

Page 3

If you have any questions with respect to these requests, please feel free to contact myself or Jennifer Jendras of Safety-Kleen.

Very truly,

  
Cynthia A. Tarka

CT:sam

cc: Brad Frost

smskpk12





DATE: September 6, 1993  
: *File Public Administrative Record File Bf.*  
FROM: Bradley Frost *Bf.*  
SUBJECT: Safety-Kleen-Pekin Administrative Record

On July 12, 1993 I received a letter (attached) from Philip Minear questioning why we were issuing a permit to the Safety-Kleen facility. My answering letter is also attached.

On June 14, 1993, Mara McGinnis and I attended a meeting of the Environmental Committee of the Tazewell County Board at the request of Pat Welch (Director of Environmental Health, Tazewell County Health Department) to explain to the committee what the RCRA permit process is and answer questions about the draft permit for Safety-Kleen's Pekin facility.

I received a letter (attached) from the Illinois Historic Preservation Agency stating that "... no significant historic, architectural or archeological resources are located within the proposed area.

Fielded a phone call on August 10, 1993 from Pat Welch (see above) about a facility request to modify the permit.

On July 7, 1993 I talked to Lynn Cardwell of WCBU radio station out of Peoria. Questions included: What was the difference between interm and full RCRA permitting? What types of comments are the IEPA trying to solicit? Who in the area had we already talked to about the permit? Any citizens?





Illinois Historic  
Preservation Agency

Old State Capitol • Springfield, Illinois 62701 • (217) 782-4836

RECEIVED  
JUL 14 1993

GOVT. & COMMUNITY AFFAIRS  
ILLINOIS EPA

217/785-4997

TAZEWELL COUNTY  
PB06-93 / Pekin  
1790600011/ILD093862811  
Safety-Kleen Corporation  
RCRA & HSWA

PLEASE REFER TO:  
IHPA LOG #930625005C-T

July 12, 1993

Mr. Bradley Frost  
IEPA/Office of Community Relations  
Community Relations Coordinator  
2200 Churchill Road  
Springfield, Illinois 62794-9276

Dear Sir:

Thank you for requesting comments from our office concerning the possible effects of the project referenced above on cultural resources. Our comments are required by Section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulations, 36 CFR 800: "Protection of Historic Properties".

Our staff has reviewed the specifications and assessed the impact of the project as submitted by your office. We have determined, based on the available information, that no significant historic, architectural or archaeological resources are located within the proposed project area.

Please retain this letter in your files as evidence of compliance with Section 106 of the National Historic Preservation Act of 1966, as amended.

Sincerely,

William L. Wheeler  
State Historic  
Preservation Officer

WLW:PGC





Dear Sirs:

I went to the 'Pekin Public Library' to review the request by the 'Safety-Kleen corporation' to store and process HAZARDOUS waste. I was unable to find it, but I did find one from the SAFETY-Kleen corporation (October, 1990) in which you refused to give them the 'OK' to do this because of their failure 'to respond to previous notices of deficiencies'. If they were bad managers before, why do we want to give them this second opportunity?

PHILIP B MINEAR  
103 CONCORD ST  
EAST PEORIA IL 61611-4442



Philip B. Minear



State of Illinois

# ENVIRONMENTAL PROTECTION AGENCY

Mary A. Gade, Director

2200 Churchill Road, Springfield, IL 62794-9276

217/785-8797

July 12, 1993

Philip B. Minear  
103 Concord Street  
East Peoria, Illinois 61611

RECEIVED  
SEP 13 1993

OFFICE OF RCRA  
WASTE MANAGEMENT  
EPA, REGION 4

Dear Mr. Minear,

I appreciate your letter and from what you have described to me, I believe that you have seen the permit application (dated October 1990) and the draft permit. I have spoken to Paula Weiss at the Pekin Public Library about the accessibility of the permit application and draft permits for the Safety-Kleen facility in Pekin. If you ask for either Ms. Weiss or Ms. Linda Miller when you go to the library, they will be able to direct you to where the materials are located.

When a facility sends in its application to the Agency, the reviewer reviews the material to check for completeness of the application. If the application is not complete we send a "Notice of Deficiency" to the applicant, in this case Safety-Kleen, to inform the applicant that it needs to submit additional information to complete the application. This notice does not mean that the company is in violation of the regulations nor are any of the company's procedures lacking. Once we have all the material to complete the application and it meets the requirements under the Resource Conservation and Recovery Act (RCRA) and the Hazardous and Solid Waste Amendments (HSWA) to RCRA, we proceed with a draft issuance of the permit and invite the public to review it and comment on it.

I hope this answers your questions. If you have any other questions concerning the site or information regarding the site, please call me at 217/785-8797 or write to me at 2200 Churchill Road, Springfield, Illinois 62706.

Sincerely,

Bradley Frost  
Community Relations Coordinator



State of Illinois

# ENVIRONMENTAL PROTECTION AGENCY

Mary A. Gade, Director

2200 Churchill Road, Springfield, IL 62794-9276

RCRA Log 96 Part B

## ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

### HAZARDOUS WASTE MANAGEMENT RCRA PART B PERMIT

IEPA #1790600011 -- Tazewell

USEPA ILD #093862811

Pekin/Safety-Kleen Corporation

Permit Log 96

RCRA -- Part B - Administrative Record

Issue Date: September 28, 1993

Effective Date: November 2, 1993

Expiration Date: November 2, 2003

Modification Date: February 24, 1995

Safety-Kleen Corporation

1000 N. Randall Road

Elgin, Illinois 60123

Safety-Kleen Corporation

Pekin Service Center

R.R. #3

Pekin, Illinois 61554

A Part B permit is hereby issued pursuant to the Resource Conservation and Recovery Act, Illinois Environmental Protection Act, and Title 35 Illinois Administrative Code (I.A.C.) parts 702, 703, 705, and 720 through 729 to Safety-Kleen to maintain and operate a waste management facility involved in the storage of hazardous waste. Safety-Kleen Corporation is located at R.R. #3 in Pekin, Illinois.

This permit consists of the conditions contained herein (including those in any attachments and appendices) and applicable regulations contained in the Illinois Environmental Protection Act and Title 35 I.A.C. Parts 702, 703, 705 and 720 through 729 in effect on the effective date of this permit. The Environmental Protection Act (Ill. Rev. Stat., Chapter 111 1/2, Section 1039) grants the Illinois Environmental Protection Agency the authority to impose conditions on permits which are issued. This Permit contains 97 pages including attachments A through G.

If you have any questions regarding this permit, please contact Ron Harmon at 217/524-3300.

Sincerely,

Harry A. Chappel, P.E.

Hazardous Waste Branch Manager

Permit Section, Bureau of Land

HAC:RH:sf/sp/794Y,3

RCRA Hazardous Waste Management Permit

Safety-Kleen Corporation

Pekin Service Center

ILD093862811

## Table of Contents

<u>Item</u>	<u>Page</u>
General Facility Description	i
I. Containers	I-1 - I-8
II. Tank Systems	II-1 - II-8
III. Reporting and Notification Requirements	III-1 - III-5
IV. Corrective Action	IV-1 - IV-12
V. Standard Conditions	V-1 - V-12

## List of Attachments

ILD093862811

	<u>Page</u>
Attachment A -- List of Wastes that can be accepted at this Facility	A-1 - A-3
Attachment B -- Inspection Schedule	B-1 - B-4
Attachment C -- Closure Certification Form	C-1 - C-1
Attachment D -- Special Conditions	D-1 - D-5
Attachment E -- Required Scope of Work for a RCRA Facility Investigation	E-1 - E-16
Attachment F -- Approved RCRA Permit Application Identification	F-1 - F-6
Attachment G -- Financial Assurance Requirements	G-1 - G-1

#### DESCRIPTION OF FACILITY

The Pekin Service Center, owned and operated by Safety Kleen Corporation, stores organic chemicals and solvent wastes from industrial and commercial facilities. Wastes accepted include parts cleaner wastes, dry cleaning wastes, paint wastes, spent antifreeze, non-hazardous waste oil, and fluid recovery service wastes (hazardous and non-hazardous wastes that remain on site for less than ten days). The facility is located two miles south of Pekin, Tazewell County, Illinois, on VFW Road, which turns east from Route 29 about 1/3 mile south of Powerton Road on approximately 2.4 acres. The facility address is R.R. #3, Pekin, Illinois 61554.

Several hazardous waste management units exist at the facility. The units include:

1. A flammable waste storage shelter and a warehouse container storage area. Ignitable wastes are stored in the flammable waste storage shelter. Non-ignitable wastes are stored in the warehouse container storage area.
2. One 4-pack tank farm and one 10,000 gallon horizontal tank. Only the northwest tank in the 4-pack tank farm and the 10,000 horizontal tank are hazardous waste tanks. The northwest tank in the 4-pack tank farm is used to store waste mineral spirits. The 10,000 gallon horizontal tank is used to store spent antifreeze. The remaining three tanks are not subject to RCRA requirements. The southwest and southwest tanks in the 4-pack tank farm are used to store non-hazardous waste oil. The northwest tank in the 4-pack tank farm is used to store product solvents.

## SECTION I: CONTAINER STORAGE

### A. SUMMARY

Containers are managed in the following units:

	<u>Status</u>	<u>Maximum Capacity</u>	<u>Dimensions</u>
Warehouse Storage Area	Existing	4728 gallons	15 ft x 28.75 ft
Flammable Waste Shelter	Existing	2184 gallons	15 ft x 20 ft

Containers of hazardous waste received at the facility for storage will arrive in either 5 gallon steel pails, 15 gallon drums (steel or polyethylene plastic), 16 gallon drums (steel or polyethylene plastic), 30 gallon drums (steel or polyethylene plastic), 55 gallon steel drums, or 85 gallon overpacks. Containers in the storage area must be stored in a manner which is consistent with the NFPA requirements in Section 4.5 NFPA 30. Safety Kleen may accept containers which are of different sizes than those listed above in accordance with the following conditions:

1. The container is DOT approved;
2. The container or its liner is compatible with the waste;
3. The container is in good condition (not rusting or leaking);
4. The facility has the available equipment and experience to properly manage the containers.

### B. WASTE IDENTIFICATION

1. All hazardous waste stored in containers shall be located in the warehouse container storage area or the flammable waste storage shelter. The locations of these storage areas are shown on Figure B-5 of the approved permit application.
2. A maximum of 4728 gallons may be stored in the warehouse container storage area, and a maximum of 2184 gallons of waste may be stored in the flammable waste storage shelter. The Permittee may store only new formula immersion cleaner waste, dry cleaning wastes (filter powder and spent filter cartridges), and spent antifreeze in the warehouse container storage area. The Permittee may only store paint wastes, mineral spirits, dumpster sediment, old formula immersion cleaner, and mineral spirits dry cleaning wastes in the flammable waste storage shelter. These wastes are identified in Section C-1 of the approved permit application and in Attachment A to this permit.



3. The Permittee is prohibited from storing a hazardous waste that has not been identified in Condition B.2 above.
4. The Permittee may store non-hazardous and hazardous wastes on a ten-day transfer basis in the warehouse container storage area and the flammable waste storage shelter. All transfer wastes must be evaluated for compatibility prior to being placed into these storage areas. In accordance with 35 Ill. Adm. Code 723.112, the Permittee also may store hazardous wastes on a ten-day transfer basis in non-RCRA permitted areas.
5. The Permittee may store non-hazardous transfer waste in containers in the warehouse container storage area and the flammable waste storage shelter for up to ten (10) days without terminating the manifest for such non-hazardous transfer waste at the facility.
6. Storage of hazardous transfer wastes for greater than ten days subjects the container storage unit to the regulatory requirements of 35 IAC 724, Subpart I. Such storage is only permitted under the following conditions:
  - a. The Safety Kleen Pekin facility is the receiving facility designated on the manifest.
  - b. The storage complies with 35 IAC 724 and the conditions of this permit.

C. CONDITION OF CONTAINERS

1. If a container holding waste is not in good condition (e.g., severe rusting, apparent structural defect, etc.) or if it begins to leak (this includes waste which appears on the outside of the drum/box but has not spread to the containment base or other containers), the Permittee must immediately transfer the waste from this container to a container that is in good condition, overpack the container, or manage the waste in accordance with the approved permit application.
2. Any transfer of waste which was required to comply with I(C)(1), must be recorded in a separate log and maintained as part of the facilities operating record.
3. Packaging of all wastes accepted for storage in the container storage area shall meet the requirements of 49 CFR 172, 178 and 179 and all applicable D.O.T. and N.F.P.A. regulations. All containers must be marked and placarded in accordance with 49 CFR 172.
4. The contents of each container shall be clearly identified on the side of the container in accordance with 49 CFR 172 prior to being placed in the container storage area.

D. Compatibility of Waste With Containers

The Permittee must use a container made of or lined with material which will not react with and is otherwise compatible with the waste to be stored so that the ability of the container to contain the waste is not impaired.

E. Management of Containers

The Permittee shall comply with the following management practices:

1. A container holding waste must always be closed during storage, except when it is necessary to add or remove or sample waste.
2. An aisle space of at least two feet shall be maintained in the warehouse container storage area and flammable waste storage area. One foot shall be maintained between pallets, and six inches shall be maintained between the pallets and the walls. Drums not stored on pallets in the flammable waste storage shelter shall be stored no closer than six inches from a wall.
3. Containers may be stacked provided that:
  - a. Only the same size or smaller containers are stacked on top of the containers beneath and;
  - b. Containers are separated by a pallet or other dunnage to provide stability and;
  - c. The stacking height does not exceed 6.5 feet.

F. Inspection

The Permittee shall inspect the container storage area weekly in accordance with the inspection schedule specified in Attachment B to this Permit. The inspection must be adequate to detect leaks and deterioration of containers and the containment systems caused by corrosion or other factors. The procedures described in the approved permit application must be used with the following modifications:

1. Action shall be taken to immediately overpack a leaking or deteriorating drum. Appropriate action to clean up any release of waste from a leaking or deteriorated drum shall be carried out immediately after the drum has been overpacked.
2. If a portion of the containment system is found to be in a deteriorated condition (cracks, gaps, spalling, failure of the coating, etc.) the Permittee shall immediately remove all waste containers from the deteriorated area until the containment system has been repaired.

3. The weekly inspection shall include checking aisle spacing, height of stacks and remaining capacity.
4. Results of all inspections and the activities undertaken to correct deficiencies shall be documented in the operating record for the facility.

G. Containment

The Permittee shall construct, operate and maintain the containment system according to the design plans and operating specifications contained in the Approved Permit Application, subject to the following modifications.

1. Safety Kleen shall perform a complete inspection of the surface coating yearly and perform annual maintenance, if necessary, to insure the integrity of the coating.

H. Special Requirements for Ignitable or Reactive Waste

1. The Permittee shall not accept reactive waste at the facility.
2. The Permittee shall not locate containers which hold ignitable waste within 50 feet of the facility's property line.
3. The Permittee shall take precautions to prevent accidental ignition or reaction of ignitable waste.
4. Ignitable wastes must be separated and protected from sources of ignition or reaction including but not limited to:
  - a. Open flames, smoking, cutting and welding, hot surfaces, frictional heat, sparks (e.g., static, electrical, or mechanical), spontaneous ignition (e.g., from heat producing chemical reactions), and radiant heat.
  - b. While ignitable waste is being handled, the Permittee must confine smoking and open flame to specially designated locations.
  - c. "No Smoking" signs must be conspicuously placed wherever there is a hazard from ignitable waste.

I. Special Requirements for Incompatible Waste

1. The Permittee shall not store containers holding a material that is incompatible with any waste or other materials stored nearby, unless separated from other waste/materials or protected from them by means of a dike, berm or other devices.

J. General Operating Requirements

The Permittee shall operate the container storage area in accordance with the approved permit application, subject to the following modifications:

1. The Permittee may receive hazardous waste for storage in containers provided the following requirements are met.
  - a. The material must be a waste which has been identified in Attachment A to this permit.
  - b. The waste must be analyzed in accordance with the approved waste analysis plan.
  - c. The facility must have a special waste stream permit or generic permit to receive the waste.
  - d. The waste must be accompanied by a properly completed Illinois manifest unless the generator is a conditionally exempt small quantity generator as defined in 35 IAC 721.105(a).
2. Cleanup of all spills inside the secondary containment areas must begin immediately upon discovery and be completed within 24 hours. Secondary containment must be inspected immediately after cleanup for cracks, gaps or other defects (failure of the coating) which would allow waste to migrate to the underlying soil. If any deterioration is discovered, the permittee shall immediately remove all waste from the deteriorated area.
3. The permittee shall remove any precipitation which accumulates in the secondary containment system within 24 hours of the time such accumulation is discovered.

K. Closure Requirements

At closure, all waste and waste residues must be removed from the containment system(s). Remaining containers, liners, bases and soil containing or contaminated with waste or waste residue must be decontaminated or removed. Closure of the container storage area(s) shall be carried out in accordance with the closure plan in the approved permit application, as modified below:

1. The permittee shall notify the Agency's Division of Land Pollution Control in writing of its intent to close the container storage area(s) at least 180 days prior to the date closure is expected to begin. Along with this notification, the Permittee shall submit the sampling and analysis plan to be used in demonstrating the storage area has been properly decontaminated. This plan shall be approved

by the Agency's Division of Land Pollution Control in writing prior to being implemented. Agency review of this plan will be subject to the permit appeal provisions contained in Sections 39(a) and 40(a) of the Environmental Protection Act. The response from the Agency shall approve and establish:

- a. The sampling plan;
  - b. What contaminants must be analyzed for; and
  - c. The level at which decontamination is considered complete.
2. The concrete surfaces shall be visually inspected, photographed, and all residue adhering to the surface must be removed by scraping and/or brushing, followed by steam cleaning and triple rinsing the concrete surfaces. All wash and rinse waste shall be collected and managed as a hazardous waste. The pad(s) must either be certified by an independent, registered, professional engineer that the surface has no cracks, gaps, or other defects which would allow waste to migrate through to the underlying soil or sampling shall be conducted to verify the underlying soil is uncontaminated.
  3. Sweepings collected during closure of the container storage area shall be managed as a hazardous waste. All washwater and rinsate generated during the closure of these units shall also be managed as a hazardous waste unless analyses indicates the sweepings are a non-hazardous waste.
  4. The Permittee shall provide post-closure care in accordance with 35 IAC, Subtitle G, Part 724, for the container storage area(s) if all of the hazardous wastes or contaminated soils cannot be practicably removed or decontaminated in accordance with the closure requirements outlined in the permit and in the approved closure plan. If it is determined that the closure requirements cannot be met and post-closure care for the container storage area(s) is required, this Permit will be modified to require post-closure care of the container storage area(s) in accordance with 35 IAC, Subtitle G, Part 724, Subparts G and H.
  5. Should post-closure care, as described in Condition K.4 above, become necessary, the Permittee shall submit an application for modification to this permit, including an amended closure and post-closure care plan for this unit, within thirty (30) days following discovery that clean closure cannot be accomplished. If a determination is made to not pursue clean closure prior to the implementation of the closure plan for the container storage area, the modification request shall be made no later than sixty (60) days after the determination is made.

6. Financial assurance for closure and post-closure of the container storage area(s), if required in accordance with Condition K.4 and K.5 above, shall be provided within thirty (30) days following modification of the permit under the provisions of Condition K.5 above.
7. Within sixty (60) days after closure of the container storage area(s) is complete, the Permittee shall submit certification to the Agency that the unit has been closed in accordance with the approved closure plan.

The closure certification form in Attachment C to this permit or a certification with identical wording must be used. Signatures must meet the requirements of 35 Ill. Adm. Code, Section 702.126. The independent engineer should be present at all critical, major points (activities) during the closure. These might include soil sampling, soil removal, backfilling, final cover placement, etc. The frequency of inspections by the independent engineer must be sufficient to determine the adequacy of each critical activity. Financial assurance must be maintained for the container storage area until the Agency approves the closure certification for the unit. The Agency's review of closure certifications for partial or final closure will be conducted in accordance with 35 IAC 724.243.

A Closure Documentation Report is to be submitted with the closure certification which includes the following activities:

- a. The volume of waste and waste residue removed, including wastes resulting from decontamination activities;
  - b. A description of the method of waste handling and transport;
  - c. Copies of the waste manifests;
  - d. A description of the sampling and analytical methods used;
  - e. A chronological summary of closure activities and the cost involved;
  - f. Tests performed, methods and results; and
  - g. Color photographs of closure activities which document conditions before, during and after closure.
8. Under the provisions of 29 CFR 1910 (51 FR 15,654, December 19, 1986), cleanup operations must meet the applicable requirements of OSHA's Hazardous Waste Operations and Emergency Response standard. These requirements include hazard communication, medical

surveillance, health and safety programs, air monitoring, decontamination and training. General site workers engaged in activities that expose or potentially expose them to hazardous substances must receive a minimum of three days of actual field experience under the direct supervision of a trained experienced supervisor. Managers and supervisors at the cleanup site must have at least an additional eight hours of specialized training on managing hazardous waste operations.

9. If the Agency determines that implementation of this closure plan fails to satisfy the requirements of 35 Ill. Adm. Code, Section 724.211, the Agency reserves the right to amend the closure plan. Revisions of closure plans are subject to the appeal provisions of Section 40 of the Illinois Environmental Protection Act.
10. Please be advised that the requirements of the Responsible Property Transfer Act (Public Act 85-1228) may apply to your facility due to the management of RCRA hazardous waste. In addition, please be advised that if you store on-site generated hazardous waste in containers or tanks pursuant to 35 IAC 722.134, those units are subject to the closure requirements identified in 35 IAC 722.134(a)(1).

## SECTION II: TANK SYSTEMS

### A. SUMMARY

Each tank at the Pekin Service Center are used for a variety of purposes, including product storage, hazardous waste storage and waste oil storage. Of these uses, the storage of hazardous waste is the only use that is regulated under RCRA. Associated with this activity are these two existing above ground tanks, each of which is dedicated to the storage of a particular waste. All above ground tank areas have secondary containment consisting of a concrete vault and an impermeable membrane or coating which has been applied to the concrete.

### B. WASTE IDENTIFICATION

1. The Permittee may store a total volume of 28,500 gallons of waste in the tanks listed below subject to the terms of this permit.

<u>Tank Number</u>	<u>Material of Construction</u>	<u>Dimensions Ht./length Dia.</u>		<u>Capacity in Gallons</u>	<u>Status</u>	<u>Minimum Shell Thickness in Inches</u>
1*	CS	26'	12'	20,000	existing	0.1875
2**	CS	26'	8'	10,000	existing	0.25

\*northwest tank in the 4-pack tank farm

\*\*horizontal tank next to the flammable waste storage shelter

2. The Permittee may store a total of 19,000 gallons of spent mineral spirits (105 parts washer solvent) as identified in Section C-1 of the approved permit application, 140 parts washer solvent, and 150 parts washer solvent in the northwest tank of the 4-pack tank farm.
3. The Permittee may store a total of 9,500 gallons of spent antifreeze as identified in Section C-1 of the approved permit application in the horizontal 10,000 gallon aboveground tank located next to the flammable waste storage shelter.
4. Storage of waste in tanks other than those specifically identified in II(B)(1), II(B)(2), and II(B)(3) is prohibited.

### C. CONTAINMENT AND DETECTION OF RELEASES

1. The Permittee shall maintain secondary containment which meets the requirements of 35 IAC 724.293 (as amended 7/16/87) for each tank identified above.
2. The Permittee shall operate and maintain the tank systems according to the detailed plans and reports contained in the approved permit application, subject to the following modifications:



- a. The Permittee shall maintain the concrete slab, the curbs, and the walls that are used as part of the containment with an impermeable interior surface coating that:
  - 1) is compatible with the waste, or any other liquid, stored in the containment system and;
  - 2) will prevent migration of the waste into the concrete of the slab or wall.
- b. The Permittee shall perform a complete inspection of the surface coating yearly and perform annual maintenance to insure the integrity of the coating.
- c. The Permittee shall maintain a compatible caulking or sealant at each existing joint to make the joint liquid tight. These joints include but are not limited to; all construction joints within the slab, walls and curbs and joints between the slab and curb, between two curbs, between the slab or curb and wall and joints between two walls. The caulking or sealant shall be compatible with the stored waste, or any other liquid, stored in the same containment system with the hazardous waste.
- d. The Permittee shall paint the vault system of the 10,000 gallon horizontal tank within 30 days of the effective date of this permit.

D. GENERAL OPERATING REQUIREMENTS

1. The Permittee shall not place hazardous wastes in a tank system if they could cause the tank, its ancillary equipment, or the containment system to rupture, leak, corrode, or otherwise fail.
2. The Permittee shall use appropriate controls and practices to prevent spills and overflows from tank or containment systems using the methods specified in the Approved Permit Application, subject to the following modifications:
  - a. All hazardous waste storage tanks shall be equipped with automatic waste feed shut-off valves connected to the continuously monitored liquid-level sensors which are activated when the tank is 95% full or;
  - b. All hazardous waste storage tanks shall be equipped with audible alarms which are activated when the tank is 95% full.

3. All hazardous wastes to be received at the tank storage area must be spent mineral spirits or spent antifreeze identified in Section C-1 of the approved permit application and in Attachment A to this permit and have been analyzed per the requirements identified in the waste analysis plan. In addition, all hazardous and non-hazardous special wastes received at the facility must be permitted by an IEPA issued special waste permit and be accompanied by a properly completed Illinois manifest unless the generator is a conditionally exempt small quantity generator as defined in 35 IAC 721.105(a).
4. An employee of Safety Kleen shall be present at all times when waste is being transferred from a tank truck to the receiving tank.
5. Precipitation accumulating within the tank farm shall be removed within 24 hours after the precipitation event has ended.

E. RESPONSE TO LEAKS OR SPILLS

In the event of a leak or a spill from the tank system, from a secondary containment system, or if a system becomes unfit (i.e., failure of the coating) for continued use, the Permittee shall remove the system from service immediately and complete the following actions (35 IAC 724.296(a)-(f)):

1. Stop the flow of hazardous waste into the system and inspect the system to determine the cause of the release.
2. Remove all waste as necessary from the system within 24 hours of the detection of the leak to prevent further release and to allow inspection and repair of the system. If the Permittee finds that it will be impossible to meet this time period, the Permittee shall notify the Agency and demonstrate that the longer time period is required.
3. If the collected material is a RCRA hazardous waste, it must be managed in accordance with all applicable requirements of 35 IAC Parts 722-724.
4. Contain visible releases to the environment. The Permittee shall immediately conduct a visual inspection of all releases to the environment and based on that inspection: (1) prevent further migration of the leak or spill to soils or surface water and (2) remove and properly dispose of any visible contamination of the soil or surface water.
5. Close the system in accordance with the Closure Plan, contained in the approved Permit Application, unless the following actions are taken:

- b. For a release caused by a leak from the primary tank system to the secondary containment system, the Permittee shall repair the primary system prior to returning it to service.

F. INSPECTIONS

1. The owner or operator must inspect in accordance with the inspection schedule in Attachment B to this Permit.
2. If a leak or spill is observed during the daily inspections, the Permittee shall immediately remove the tank system in question from service and follow the procedures set forth in 35 IAC 724.296.
3. Releases of hazardous waste from spills and leaks which are observed in the secondary containment system shall be removed within the same operating shift during which they are detected and managed as a hazardous waste.
4. The Permittee shall inspect each tank system to assess its condition. This inspection shall consist of a visual inspection, a pressure test and an ultrasonic thickness test in accordance with the following procedures:
  - a. An ultrasonic thickness test shall be conducted annually on the tank.
  - b. A hydrostatic leak test or other integrity assessment as approved by the Agency shall be conducted annually on the tank ancillary equipment.
  - c. A detailed visual inspection of the tank's interior shall be conducted every fifth year to ensure the tank's integrity. During this internal inspection, the internal surface shall be inspected for rust, cracks and thin areas. Corrective action as specified by a qualified registered professional engineer or corrosion technician shall be taken if the internal inspection indicates that the interior surface of a tank system has been detrimentally affected by the hazardous waste which has been stored in it. Tanks shall be entered in accordance with 29 CFR 1910.94(d)(11). The first internal inspection shall be conducted in accordance with the following schedule:

- i. Spent mineral spirit tank by the end of 1994.
- ii. Spent antifreeze tank by the end of 1995.
- d. The inspection of each tank shall be certified by a qualified, registered professional engineer, or corrosion technician.
- e. All waste and washwater generated during evacuation of the tanks shall be managed as a hazardous waste unless analyses indicates the waste and washwater are non-hazardous waste.
- f. Results of the inspection identified in 4(a), (b), and (c) above shall be submitted to the Division of Land Pollution Control of this Agency within 60 days of the inspection date, and shall also be included in the operating record of this facility.
- g. If the results of these inspections indicate a tank system is leaking, the procedures set forth in 35 IAC 724.296 (as amended July 16, 1987) shall be followed.

G. REPORTING AND RECORDKEEPING

- 1. The Permittee shall report to the Agency's Division of Land Pollution Control Field Office within twenty-four (24) hours of detection of a leak or spill occurs in the tank system or secondary containment system unless the spill or leak of hazardous waste is less than or equal to one pound in quantity and it is immediately contained and cleaned up.
- 2. Within thirty (30) days of detecting a release as described above to the environment from the tank system or secondary containment system, the Permittee shall report the following information in writing to the Division of Land Pollution Control of this Agency:
  - a. Likely route of migration of the release;
  - b. Characteristics of surrounding soil (including soil composition, geology, hydrogeology, and climate);
  - c. Results of any monitoring or sampling conducted in connection with the release;
  - d. Proximity to downgradient drinking water, surface water, and populated areas;
  - e. Description of response actions taken or planned
- 3. The permittee shall submit to the Agency all certifications of major repairs to correct leaks within seven days from returning the tank system to use (35 IAC 724.296(f)).

H. SPECIAL REQUIREMENTS FOR IGNITABLE OR REACTIVE WASTES

1. The Permittee shall not place ignitable waste in the tank system, unless the procedures specified in the Approved Permit Application are followed.
2. The Permittee shall comply with the requirements for the maintenance of protective distances between the waste management area and any public ways, streets, alleys, or an adjoining property line that can be built upon as required in Tables 2-1 through 2-6 of the National Fire Protection Association's "Flammable and Combustible Liquids Code" (1987).
3. The Permittee shall not place reactive waste/material in the tank systems at this facility.

I. SPECIAL REQUIREMENTS FOR INCOMPATIBLE WASTES

1. The Permittee shall not place incompatible wastes together in the same tank system. The facility shall not store waste in a tank which previously held an incompatible waste, unless the tank system has been decontaminated.

J. CLOSURE

At closure, all waste and waste residues must be removed from tanks, discharge control equipment and discharge confined structures. Closure of the tank storage area shall be carried out in accordance with the closure plan in the approved permit application, as modified below:

1. The Permittee shall notify the Agency's Division of Land Pollution Control in writing of its intent to close the tank system at least 180 days prior to the date closure is expected to begin. Along with this notification, the Permittee shall submit the sampling and analysis plan to be used in demonstrating a tank system has been properly decontaminated. The plan shall be approved by the Agency's Division of Land Pollution Control in writing prior to being implemented. Agency review of this plan will be subject to the permit appeal provisions contained in Section 39(a) and 40(a) of the Illinois Environmental Protection Act. The response from the Agency shall approve and establish:
  - a. The sampling plan;
  - b. What contaminants must be analyzed for;
  - c. The level at which decontamination is considered complete.

2. The concrete surfaces shall be visually inspected, photographed and any residue adhering to the surface must be removed by scraping and/or brushing. Following this, the concrete surfaces must be steam cleaned and triple rinsed. All wash and rinse water shall be collected. For tank systems which include secondary containment systems which met the requirements of 35 IAC 724.293 at the time of installation, the secondary containment must be certified by an independent, registered, professional engineer indicating that the surface has no cracks, gaps or other defects which would allow waste to migrate through to the underlying soil. If such a certification cannot be made, soil sampling and analysis must be conducted to establish clean closure.
3. Sweepings collected during closure of any tank system shall be managed as a hazardous waste. All washwater and rinsate generated during the closure of these units shall also be managed as a hazardous waste unless analyses indicates the sweepings are a non-hazardous waste.
4. The Permittee shall provide post-closure care in accordance with 35 IAC Part 724 for a tank system if all of the hazardous wastes or contaminated soils cannot be practicably removed or decontaminated in accordance with the closure requirements outlined in this permit and in the approved closure plan. If it is determined that the closure requirements cannot be met and post-closure care is required, the tank system shall be considered to be a landfill and the post-closure care plan in the approved application will be modified as required to provide adequate post-closure care for the affected tank system(s) in accordance with 35 IAC, Subtitle G, Part 724, Subparts G and H.
5. Should post-closure care, as described in Condition 3 above, become necessary, the Permittee shall submit an application for modification to this permit, including an amended closure plan and post-closure care plan for the affected tank system within thirty (30) days following discovery that clean closure cannot be accomplished. If a determination is made not to pursue clean closure prior to the implementation of the closure plan for the tank system, the modification request shall be made no later than sixty (60) days after the determination is made.
6. Financial assurance for closure and post-closure of any tank system being closed as a landfill, when required in accordance with Conditions 3 and 4 above, shall be updated within thirty (30) days following modification of the permit under the provisions of Condition 4 above.

7. Within sixty (60) days after closure of any tank system is complete, the Permittee shall submit certification to the Agency that the unit has been closed in accordance with the approved closure plan.

The closure certification form in Attachment C to this permit or a certification with identical wording must be used. Signatures must meet the requirements of 35 Ill. Adm. Code Section 702.126. The independent engineer should be present at all critical, major points (activities) during the closure. This might include soil sampling, soil removal, backfilling, final cover placement, etc. The frequency of inspections by the independent engineer must be sufficient to determine the adequacy of each critical activity. Financial assurance must be maintained for each tank system identified in Condition B.1 above. Documents regarding financial assurance for closure of this facility may be modified after the Agency approves the closure certification for any or all of the tank systems. The Agency's review of closure certifications for partial or final closure will be reviewed in accordance with 35 IAC 724.243.

A Closure Documentation Report is to be submitted with the closure certification which includes the following items, if applicable:

- a. The volume of waste and waste residue removed, including wastes generated during decontamination procedures.
- b. A description of the method of waste handling and transport.
- c. Copies of the waste manifests.
- d. A description of the sampling and analytical methods used.
- e. A chronological summary of closure activities and the cost involved.
- f. Tests performed, methods and results.
- g. Color photographs of closure activities which document conditions before, during and after closure.

### Section III: REPORTING AND NOTIFICATION REQUIREMENTS

The reporting and notification requirements of each section of the RCRA permit are summarized below. This summary is provided to highlight the various reporting and notification requirements of this permit.

<u>Condition</u>	<u>Submittal</u>	<u>Due Date</u>
SECTION I: CONTAINERS		
K(1)	Notify Agency of intent to close the container storage area	180 days prior to commencement of closure
K(1)	Submit sampling and analysis plan for review	180 days prior to commencement of closure
K(5)	Submit application for modification of permit and post-closure care plan	No later than 30 after determination that the container storage area cannot be clean closed
K(6)	Update financial assurance to include modification in Conditions I(K)(4) or I(K)(5)	30 days after permit is modified
K(7)	Submit certification for closure of the container storage area	Within 60 days after closure is completed

### SECTION II: TANK SYSTEMS

C(2)(d)	Paint the vault system of the 10,000 gallon horizontal tank this permit	Within 30 days of effective date of
F(4)(f)	Results of tank integrity assessment	60 days after inspection
G(1)	Notify Agency of a leak or spill unless the spill or leak of hazardous waste is less than or equal to one pound and it is immediately contained and cleaned up	24 hours after leak or spill occurs
G(2)	Report to Agency on release and Permittee's response	30 days after leak or spill occurs



G(3)	Certification of major repairs	Within seven days from returning tank system to service
J(1)	Notify Agency of intent to close tank system(s)	180 days prior to commencement of closure
J(1)	Submit sampling and analysis plan	180 days prior to commencement of closure
J(4)	Submit application for permit modification and post-closure care plan	30 days after determination that a tank system must be closed as a landfill
J(5)	Financial Assurance for closure or post-closure	30 days after effective date of permit or modification of permit or 30 days after close of the fiscal year
J(6)	Submit certification of closure of tank system(s)	60 days after closure of tank system(s) is complete

#### SECTION IV: CORRECTIVE ACTION

B	Submit a RCRA Facility Investigation (RFI) Phase 1 Workplan	within 4 months after effective date of this permit
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#### SECTION V: STANDARD CONDITIONS

6	Complete application for new permit	180 days prior to permit expiration
11	Information requested by Agency and copies of records required to be kept by this permit	Submittal date to be determined by Agency
14	Notify Agency of planned physical alterations or additions	15 days prior to planned change

15	Notify Agency of changes which may result in permit noncompliance	Within 15 days of change
16	Application for permit modification indicating permit is to be transferred	At least 90 days prior to transfer date
18	Submission of any information required in a compliance schedule	14 days after each schedule date
19	Report to Agency any non-compliance which may endanger health or environment	
	by telephone	24 hours after discovery
	in writing	5 days after discovery
20	Report all other instances of noncompliance	March 1 of each year along with Annual Report
28	Notify the Regional Administrative in writing of expected receipt of hazardous waste from a foreign source	4 weeks prior to receipt of waste
40	Update arrangements with local authorities	At least annually
41	Implementation of Contingency Plan	
	Notify appropriate state and local agencies with designated response roles	As needed
	Notify appropriate local officials	Immediately, if emergency coordinator's assessment indicates evacuation of local area is advisable

	Notify the Agency (217/782-3637) and Illinois ESDA (217/782-7860) if emergency coordinator determines there has been a release, fire or explosion which could threaten human health or the environment, outside the facility	Immediately after determination made
	Notify Agency and appropriate state and local authorities, in writing that facility is in compliance with 35 IAC 724.156(h)	Prior to resuming operation in affected areas
	Report to Agency details regarding incident which required implementation of contingency plan	15 days after event
47	Submit annual report required by 35 IAC 724.175	March 1 of each year
49	Application for permit modification amending closure plan	Within 90 days of discovery of need for modification
50	Notify Agency that expecting to close	60 days prior to beginning closure
54(a)	Adjust closure cost estimate for inflation	30 days after close of fiscal year
54(b)	Revision of closure cost estimate	As needed, within 90 days of discovery of revision
55	Change in financial assurance mechanism for closure	As needed
56	Change in coverage for sudden and non-sudden accidental occurrences	As needed
57	Notify Agency of commencement of voluntary or involuntary bankruptcy proceedings	10 days after commencement of proceeding

ATTACHMENT D: ADDITIONAL SPECIAL CONDITIONS

C(1)	Submit closure plan	180 days prior to closure of any hazardous waste management unit
D(1)	Submit an engineering certification that the 10,000 gallon horizontal tank and piping have been painted	Within 60 days of the effective date of this permit
E(2)	Notify Emergency Response Teams	Immediately upon implementation of contingency plan
E(3)	Documentation of submittal of required information to Emergency Response entities	within 60 days of the effective date of this permit
E(4)	Documentation of agreements/arrangements with local units	within 60 days of the effective date of this permit

#### SECTION IV: CORRECTIVE ACTION

##### A. INTRODUCTION

In accordance with Section 3004 of RCRA and 35 IAC 724.201, the Permittee shall institute such corrective action as necessary to protect human health and the environment from all releases of hazardous wastes or hazardous constituents, listed in Appendix H of 35 IAC Part 721, from any solid waste management unit (SWMU) at its facility in Pekin, Illinois. This shall be accomplished by:

1. Conducting a RCRA Facility Investigation (RFI) to determine whether releases of hazardous wastes and hazardous constituents have occurred from any solid waste management unit (SWMU) at its Pekin facility, and if so, the nature and extent of the release(s).
2. Based upon the results of the RFI, developing and implementing a Corrective Action Plan which describes the necessary corrective actions which will be taken. The required corrective actions shall be those actions necessary to protect human health and the environment from all releases of hazardous wastes or hazardous constituents, listed in Appendix H of 35 IAC Part 721, from any of the SWMUs determined to pose an environmental threat by the RFI required under the terms and conditions of this permit.

##### B. CONDUCTING THE RCRA FACILITY INVESTIGATION

The Permittee must conduct a RCRA Facility Investigation to determine the nature and extent of releases of hazardous wastes and hazardous constituents from certain SWMUs at the subject facility. This RFI shall be carried out in three phases. Each phase will provide for a more detailed evaluation of each Solid Waste Management Unit identified. The requirements for the RFI are provided in Attachment E to the permit.

1. Based upon the results of the RCRA Facility Assessment which was conducted by the Agency for this facility, the SWMUs identified in the table below must be evaluated in the RFI for potential releases to certain environmental media of concern also identified in the table. (Please note that this is not a complete listing of SWMUs at the subject facility.):

<u>SWMU #</u>	<u>Unit</u>	<u>Environmental Media of Concern</u>
13	Warehouse Container Storage Area Trenches	soil, groundwater
14	Warehouse Drain	soil, groundwater
16	Past Oil Spill	soil, groundwater

2. The Permittee shall submit to the Illinois Environmental Protection Agency's Division of Land Pollution Control (Agency's DLPC) Permit Section, within 120 days after the effective date of this permit, a written RCRA Facility Investigation (RFI) Phase I Workplan. In general, the Phase I RFI Workplan must contain the following:
  - a. General information regarding the Safety Kleen facility in Pekin, Illinois.
  - b. Information, as it is available, regarding each SWMU identified in Condition IV.B.1 above which (1) characterizes the unit, (2) describes its history of operations, and (3) documents the unit's integrity.
  - c. Proposed procedures, including field activities, to determine the absence or presence of releases of hazardous waste or hazardous constituents to the soil and/or air from each SWMU which is determined, based on the unit and waste characterization in IV.B.2.b, to have a potential to have released hazardous waste or hazardous constituents to the environmental media.

More specific requirements regarding what must be contained in the Phase I Workplan are contained in Attachment E to this permit.
3. The Agency's DLPC will approve, approve with modifications, or disapprove the Phase I Workplan in writing and provide comments regarding the necessary corrections or modifications.
  - a. Within 60 days of receipt of such comments, the Permittee must modify the plan or submit a new plan for the Agency's DLPC approval.
  - b. Within 30 days of the Agency's DLPC approval of the RFI Phase I Workplan, the Permittee shall begin implementing the Workplan according to the terms and schedule in the Workplan.
  - c. Agency action on the Phase I Workplan will be subject to the appeal provisions of Sections 39(a) and 40(a) of the Illinois Environmental Protection Act.
4. The Permittee must submit a report documenting the efforts carried out as set forth in the approved RFI Phase I Work Plan in accordance with the schedule established in the approved Workplan. This report must be organized so as to present a comprehensive and coherent description of the sources, nature and extent of soil contamination discovered at each SWMU during the Phase I RFI. The report must also

discuss and evaluate the results of the Phase I RFI associated with each SWMU and include conclusions related to the need for additional investigation at each SWMU as part of a Phase II RFI. This report must be prepared in accordance with (1) the Data Management Plan which is to be a part of the RFI Phase I Workplan (see Item III.F of Attachment E to this permit) and (2) any modifications to the Workplan imposed by the Agency as part of its approval of the workplan.

- a. Since the report must include conclusions related to the need for a Phase II investigation, it must contain proposed concentrations which will be used to make this determination. Justification for these proposed values must also be included in the report.
5. Following the submittal of the RFI Phase I report, the Agency's DLPC will review the submitted data and notify the Permittee in writing of the results of the review. This notification will discuss the status of each of the SWMUs evaluated as part of Phase I of the RFI.
  - a. If the Agency's DLPC determines, based upon the data provided within and obtained from the Phase I Workplan for each SWMU investigated, that (1) there is no potential for release from that SWMU to the environmental media of concern and (2) there has been no release of hazardous wastes or hazardous constituents to the environmental media of concern from that SWMU, then no further action will be required for that SWMU.
  - b. If the Agency's DLPC determines, based on the data from the Phase I RFI for each SWMU investigated, that (1) there has been a release to any environmental media of concern, (2) there currently is a release to any environmental media of concern, or (3) the data associated with a given SWMU is inconclusive, then the Permittee will be required to conduct additional investigation of the SWMU as part of Phase II and, if necessary, Phase III of the RFA.
  - c. The final letter sent to the facility conveying the results of the review will:
    1. Identify those SWMUs for which no further investigation is needed;
    2. Identify which SWMUs which must be further investigated to determine the rate and extent of migration of hazardous waste or hazardous constituents and the concentrations of the hazardous waste or hazardous constituents in the environmental media potentially impacted by the SWMU;

3. Identify, for each SWMU requiring further investigation, the associated environmental media which must be further investigated;
  4. Indicate whether the facility must perform a Phase II and/or a Phase III RFI Investigation for those SWMUs requiring further investigation. Unless sufficient information is provided to the Agency as a result of additional investigation in the Phase II investigation, units which have the possibility of releasing hazardous waste or hazardous constituents to groundwater must be evaluated as part of Phase III of the RFA.
- d. Agency action on the final Phase I RFI report and proposed cleanup objectives will be subject to the appeal provisions of Sections 39(a) and 40(a) of the Illinois Environmental Protection Act.
6. If the Permittee is notified in writing in accordance with Condition IV.B.5.c that any SWMUs identified in Condition IV.B.1 above must be included in Phase II of the RFI, then the Permittee must develop and submit a Phase II RFI Workplan. Phase II of the RFA shall focus on determining the rate and extent of migration of hazardous waste or hazardous constituents and the concentrations of the hazardous waste or hazardous constituents in the soil and/or air potentially impacted by the SWMU. Only the media potentially impacted by each SWMU as identified in the Agency notification set forth in Condition IV.B.5.c above must be investigated. Such a workplan must be submitted no more than 90 days after the facility is notified in writing in accordance with Condition IV.B.5.c above. The requirements for a Phase II of the RFI are contained in Attachment E to the permit.
  7. The Agency's DLPC will approve, modify and approve, or disapprove the Phase II workplan in writing and provide comments regarding the required corrections or modifications.
    - a. Within 60 days of the receipt of such comments, the Permittee must modify the plan or submit a new plan for the Agency's DLPC approval.
    - b. Within 30 days of the Agency's DLPC approval of the RFI Phase II Workplan, the Permittee shall begin implementing the plan according to the terms and schedule established in the Phase II Workplan.



- c. Agency action on the Phase II workplan will be subject to the appeal provisions of Sections 39(a) and 40(a) of the Illinois Environmental Protection Act.
8. The Permittee must submit a report documenting the efforts carried out in accordance with the approved RFI Phase II Workplan in accordance with the schedule established within the Phase II Workplan. This report must be prepared in a manner which is similar to that specified in Condition IV.B.4 above.
- a. Should the Permittee wish to propose target soil cleanup objectives for corrective measures, such a proposal must be submitted to the Agency upon submittal of the RFI Phase II report. Such a request must consider distance from the subject SWMU(s) to potential receptors, 35 IAC 620 groundwater quality standards, and it must provide an assessment of potential threats to human health and the environment in proposing soil, surface water or groundwater target cleanup objectives (i.e., the proposal should include a site and contaminant specific risk assessment which ensures that alternative target cleanup objectives will not allow the groundwater quality standards to be exceeded, or pose a threat to human health and the environment). The Agency will establish cleanup objectives for corrective measures if no objectives are proposed by the Permittee.
9. Following submittal of the RFI Phase II report, the Agency's DLPC will review the data obtained from the RFI Phase II investigation and notify the Permittee in writing of the results.
- a. If the Agency determines that there is a potential that groundwater has been impacted by a release of hazardous wastes or hazardous constituents from any SWMU evaluated during the Phase II investigation, then the Permittee must conduct Phase III of the RFI for such SWMUs. The purpose of the Phase III investigation of the RFI will be to define the extent of releases, both on-site and off-site, to the groundwater from SWMUs for which the results of the Phase II investigation indicate a release to groundwater. The requirements associated with a Phase III Investigation are contained in Attachment E to this permit.
  - b. If the Agency's DLPC determines that a RFI Phase III investigation is not required, based on data obtained from the RFI Phase II investigation, the Agency reserves the right to require that corrective measures be conducted for the SWMU(s) of concern to address releases identified through the Phase I and Phase II investigations.

- c. The Agency's response to the Phase II report will:
    - i. Identify those SWMUs and associated environmental media for which Phase III of the RFI must be conducted; and,
    - ii. Identify those SWMUs and associated environmental media for which corrective action is required, although no Phase III investigation is required.
  - d. Agency action on the final RFI Phase II report will be subject to the appeal provisions of Sections 39(a) and 40(a) of the Illinois Environmental Protection Act.
10. Within 90 days of notification of the need for a Phase III investigation, the Permittee shall submit a plan for conducting Phase III of the RFI. The Agency's DLPC will approve, modify and approve, or disapprove and provide comments to the Permittee as to the corrections or modifications needed for the RFI Phase III Workplan.
- a. Within 60 days of receipt of such comments, the Permittee must modify the plan or submit a new plan for the Agency's DLPC approval.
  - b. Within 30 days of the Agency's DLPC approval of the RFI Phase III Workplan, the Permittee shall begin implementing the plan according to the terms and schedule established within the Workplan.
  - c. Agency action on the Phase III workplan will be subject to the appeal provisions of Sections 39(a) and 40(a) of the Illinois Environmental Protection Act.
11. Within 120 days of receipt of the Agency's response identified in Condition IV.B.9.c, the Permittee shall submit to the Agency's DLPC a Corrective Action Plan (CAP), in accordance with the requirements outlined in Condition IV.C. below for those SWMUs identified in the response as requiring corrective action that do not need to evaluate as part of the Phase III investigation.
12. The Permittee must submit a report documenting the efforts carried out in accordance with the approved RFA Phase III Workplan in accordance with the schedule set forth in that workplan. This report must be prepared in a manner which is similar to that specified in Condition IV.B.4 above.

13. Following submittal of the RFI Phase III report, the Agency's DLPC will review the data contained in the report and notify the Permittee in writing of the results.
  - a. If the Agency determines that there has been a release of hazardous waste or hazardous constituents from a SWMU to the groundwater, then the Permittee must perform corrective action, as necessary, to protect human health and the environment.
  - b. If the Agency determines that there (1) has not been a release of hazardous waste or hazardous constituents from a SWMU to the groundwater and (2) is no potential for releases of hazardous waste or hazardous constituents from a SWMU to the groundwater, then no corrective action will be required at that SWMU relating to groundwater.
  - c. If the Agency determines (1) that there has not been a release of hazardous waste or hazardous constituents from a SWMU to the groundwater and (2) that there is a potential for future releases of hazardous waste or hazardous constituents from a SWMU to the groundwater, then the Agency may require a longer term groundwater monitoring program at any SWMU where substantial soil contamination exists (as determined by the Agency), or at any SWMU which would meet the definition of a land disposal unit.
  - d. The Agency's response to the Phase III report will:
    - i. Identify those SWMUs investigated as part of Phase III of the RFI from which there has been a release of hazardous waste or hazardous constituents to groundwater that requires corrective action;
    - ii. Identify those SWMUs investigated as part of Phase III of the RFI for which no corrective action is required for groundwater at this time;
    - iii. Identify those land-based SWMUs investigated as part of the Phase III RFI for which a longer term groundwater monitoring program must be established. "Land-based SWMUs" are SWMUs where waste, contaminated soil and/or contaminated groundwater are allowed to remain in-place.
  - e. Agency action on the Phase III Workplan will be subject to the appeal provisions of Sections 39(a) of the Illinois Environmental Protection Act.

14. If the Agency's notification identified in Condition IV.B.13.d above requires that corrective action be performed for releases of hazardous waste or hazardous constituents to the groundwater from certain SWMUs, then the Permittee must submit a Corrective Action Plan for this release from the SWMU(s) of concern which meets the requirements of Condition IV.C below for review and approval. This plan must be submitted within 120 days of the date that the notification identified in Condition IV.B.13.d is received by the Permittee.
15. If the Agency's notification identified in Condition IV.B.13.d above requires that a longer term groundwater monitoring program be established for certain SWMUs, then the Permittee must submit such a plan within 120 days after receiving this notification. This plan must be developed in accordance with the general procedures set forth in Section IV.D.4 of Attachment E. The Agency's DLPC will approve, modify and approve or disapprove and provide comments to the Permittee as to corrections or modifications needed for the program.
  - a. Within sixty (60) days of receipt of such comments, the Permittee must modify the plan or submit a new plan for the Agency's approval.
  - b. Within thirty (30) days of the approval of the plan, the Permittee shall begin implementing the plan in accordance with the terms and schedule established in the plan.
  - c. Agency action on the groundwater monitoring plan will be subject to the appeal provisions of Sections 39(a) and 40(a) of the Illinois Environmental Protection Act.

C. CORRECTIVE ACTION REQUIREMENTS

If, in accordance with Conditions IV.B.9 and/or IV.B.13, it is determined that corrective actions must be taken in response to releases from any SWMU, then the Permittee shall develop a Corrective Action Plan (CAP). This plan must be submitted within 120 days after receipt of the notification from the Agency that corrective actions are necessary to protect human health and the environment from observed releases from SWMUs at the facility. The purpose of the CAP is to develop and evaluate corrective action alternative(s) and evaluate corrective action measure(s) which will satisfy the target cleanup objectives specified by the Agency's DLPC. The proposed corrective actions must be sufficient to protect human health and the environment from the observed release.

The Agency DLPC will approve, modify and approve, or disapprove and provide comments to the Permittee as to the corrections or modifications needed for the CAP. Within 60 days of receipt of such comments, the Permittee must modify the CAP or submit a new CAP for the Agency's DLPC approval. The Agency's DLPC approval of one or more of the corrective measure(s) will consider, at a minimum, performance, reliability, implementability, safety, human health and the environmental impact of the measure(s). The formal approval and incorporation of the selected corrective measure(s) into the Part B permit will be via the Class 2 Permit Modification procedures identified in 35 IAC 703.282. The Permittee shall begin implementing the selected corrective measure(s) according to the terms and schedule identified in the modified permit.

D. FINANCIAL ASSURANCE FOR CORRECTIVE ACTION

1. The Permittee shall prepare a cost estimate for the completion of any corrective measure(s) required under this permit, in order to provide financial assurance for completion of corrective action, as required under 35 IAC 724.201(b). Such a cost estimate will be based upon the cost of contamination investigations and assessments for the SWMU(s), and design, construction, operation, inspection, monitoring, and maintenance of the corrective measure(s) to meet the requirements of 35 IAC 724.201, Attachment E and this permit. This cost estimate must be submitted to the Agency's DLPC and revised according to the following schedule:

<u>Facility Submission</u>	<u>Due Date</u>
Initial Cost Estimate (with Workplan)	120 days after the RFI Phase I effective date of this permit
Revised Cost Estimate (with the initial submittal of each RFI Report)	Upon written Agency request

2. The Permittee shall demonstrate continuous compliance with 35 IAC 724.201 by providing documentation of financial assurance using a mechanism specified in 35 IAC 724.243, in at least the amount of the cost estimate required under Condition IV.D.1. The words "completion of corrective action" shall be substituted for "closure and/or post-closure", as appropriate in the financial instrument specified in 35 IAC 724.251. The documentation shall be submitted to the Agency's DLPC within 60 days after the submittal of the initial or revised cost estimates required under Condition IV.D.1. The Agency's DLPC may accept financial assurance for completion of corrective action in combination with another financial mechanism that acceptable under 35 IAC 724.246 at its discretion.

E. FUTURE RELEASES FROM SWMUs

Whenever the Permittee becomes aware that any SWMU, that was not found to be releasing hazardous waste or hazardous constituents during the RFI, or was not addressed under the corrective action requirements of this permit, may have started to release hazardous waste or hazardous constituents, the Permittee shall report this information to the Agency's DLPC in writing within thirty (30) days of discovery. Upon the Agency's written request, the Permittee shall determine the nature and extent of the contamination by following the procedures set forth in Conditions IV.B through IV.D, beginning on the date of notification, rather than on the effective date of the permit.

F. NOTIFICATION REQUIREMENTS FOR AN ASSESSMENT OF NEWLY-IDENTIFIED SOLID WASTE MANAGEMENT UNIT(S)

1. The Permittee shall notify the Agency's DLPC in writing of any newly-identified SWMU(s) discovered during the course of groundwater monitoring, field investigations, environmental audits, or other means, no later than sixty (60) calendar days after discovery. The notification shall provide the following information, if available:
  - a. The location of the newly-identified SWMU in relation to other SWMUs on a scaled map or drawing;
  - b. The type and past and present function of the unit;
  - c. The general dimensions, capacities, and structural description of the unit (available drawings and specifications provided);
  - d. The period during which the unit was operated;
  - e. The specifics on all materials, including but not limited to, wastes and hazardous constituents, that have been or are being managed at the SWMU, to the extent available; and
  - f. The results of any relevant available sampling and analysis which may aid in determining whether releases of hazardous wastes or hazardous constituents have occurred or are occurring from the unit.
2. If the submitted information demonstrates a potential for a release of hazardous waste or hazardous waste constituents from the newly identified SWMU, the Agency's DLPC may request in writing, that the Permittee prepare a Solid Waste Management Unit (SWMU) Assessment

Plan and a proposed schedule of implementation and completion of the Plan for any additional SWMU(s) discovered subsequent to the issuance of this Permit.

3. Within 120 calendar days after receipt of the Agency's DLPC request for a SWMU Assessment Plan, the Permittee shall prepare a SWMU Assessment Plan consistent with the requirements of IV.B through IV.D above. This SWMU Assessment plan must also propose investigations, including field investigations if necessary, to determine the release potential to specific environmental media for the newly-identified SWMU. The SWMU Assessment Plan must demonstrate that the sampling and analysis program, if applicable, is capable of yielding representative samples and must include parameters sufficient to identify migration of hazardous waste and hazardous constituents from the newly-discovered SWMU(s) to the environment.
4. After the Permittee submits the SWMU Assessment Plan, the Agency's DLPC shall either approve, approve with conditions or disapprove the Plan in writing. If the plan is approved, the Permittee shall begin to implement the Plan within forty-five (45) calendar days of receiving such written notification. If the Plan is disapproved, the Agency's DLPC shall notify the Permittee in writing of the Plan's deficiencies specify a due date for submittal of a revised plan.
5. The Permittee shall submit a report documenting the results of the approved SWMU Assessment Plan to the Agency's DLPC in accordance with the schedule in the approved SWMU Assessment Plan. The SWMU Assessment Report shall describe all results obtained from the implementation of the approved SWMU Assessment Plan.

G. COMPLETION OF CORRECTIVE ACTION

1. The Permittee shall complete those corrective actions contained in the Corrective Action Plan approved in accordance with Condition IV.C above. The Permittee may request the Agency's DLPC to consider corrective action complete at any point during compliance with this permit. The petition should include a demonstration of the following:
  - a. The Permittee shall demonstrate that there have been no releases of hazardous waste or hazardous constituents to any media from the SWMUs; or
  - b. The Permittee shall demonstrate that all releases of hazardous waste or hazardous constituents to all media targeted within the RFI for investigation have been remediated to the target cleanup

objectives specified within the approved Corrective Measures Plan, and shall also describe how releases will be prevented in the future; or

- c. Some combination of the above demonstrations.

Appropriate documentation and certification must accompany such a demonstration.

The Permittee shall be notified in writing if the Agency's DLPC approves the request that the corrective actions can be considered complete. The notification from the Agency's DLPC to the Permittee may include a release from the financial requirements of Condition F above.

2. A determination of no further action shall not preclude the Agency's DLPC from requiring continued or periodic inspections of the SWMU(s) or continued or periodic monitoring of the specified environmental media when site-specific circumstances indicate that releases of hazardous wastes including hazardous constituents are likely to occur, if necessary to protect human health and the environment. Any requirement for long-term groundwater monitoring may only be required at SWMUs where substantial soil contamination exists (as determined by the Agency) or at any SWMU which would meet the definition of a land disposal unit.
3. A determination of no further action shall not preclude the Agency's DLPC from requiring further investigations, studies, or remediation at a later date, if new information or subsequent analysis indicates a release or likelihood of a release from a SWMU at the facility that is likely to pose a threat to human health or the environment. In such a case, the Agency's DLPC shall initiate a permit modification to rescind the determination of no further action.



## SECTION V: STANDARD CONDITIONS

### GENERAL REQUIREMENTS

1. EFFECT OF PERMIT. The existence of a RCRA permit shall not constitute a defense to a violation of the Environmental Protection Act or Subtitle G, except for development, modification or operation without a permit. Issuance of this permit does not convey property rights or any exclusive privilege. Issuance of this permit does not authorize any injury to persons or property or invasion of other private rights, or infringement of state or local law or regulations. (35 IAC 702.181)
2. PERMIT ACTIONS. This permit may be modified, reissued or revoked for cause as specified in 35 IAC 703.270 through 703.273 and Section 702.186. The filing of a request by the Permittee for a permit modification or revocation, or a notification of planned changes or anticipated noncompliance on the part of the Permittee does not stay the applicability or enforceability of any permit condition. (35 IAC 702.146)
3. SEVERABILITY. The provisions of this permit are severable, and if any provision of this permit, or the application of any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances and the remainder of this permit shall not be affected thereby. (35 IAC 700.107)
4. PERMIT CONDITION CONFLICT. In case of conflict between a special permit condition and a standard condition, the special condition will prevail. (35 IAC 702.160)
5. DUTY TO COMPLY. The Permittee shall comply with all conditions of this permit except for the extent and for the duration such noncompliance is authorized by an emergency permit. Any permit noncompliance constitutes a violation of the Environmental Protection Act and is grounds for enforcement action; permit revocation or modification; or for denial of a permit renewal application. (35 IAC 702.141 and 703.242)
6. DUTY TO REAPPLY. If the Permittee wishes to continue an activity allowed by this permit after the expiration date of this permit, the Permittee must apply for a new permit at least 180 days before this permit expires, unless permission for a later date has been granted by the Agency. (35 IAC 702.142 and 703.125)
7. PERMIT EXPIRATION. This permit and all conditions herein will remain in effect beyond the permit's expiration date if the Permittee has submitted a timely, complete application (see 35 IAC 703.181-703.209) and through no fault of the Permittee the Agency has not issued a new permit as set forth in 35 IAC 702.125.

NEED TO HALT OR REDUCE ACTIVITY NOT A DEFENSE. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. (35 IAC 702.143)

9. DUTY TO MITIGATE. In the event of noncompliance with the permit, the permittee shall take all reasonable steps to minimize releases to the environment, and shall carry out such measures as are reasonable to prevent significant adverse impacts on human health or the environment. (35 IAC 702.144)
10. PROPER OPERATION AND MAINTENANCE. The Permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the Permittee to achieve compliance with the conditions of this permit. Proper operation and maintenance includes effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory, and process controls, including appropriate quality assurance procedures. This provision requires the operation of back-up or auxiliary facilities or similar systems only when necessary to achieve compliance with the conditions of the permit. (35 IAC 702.145)
11. DUTY TO PROVIDE INFORMATION. The Permittee shall furnish to the Agency, within a reasonable time, any relevant information which the Agency may request to determine whether cause exists for modifying, revoking and reissuing or terminating this permit, or to determine compliance with this permit. The Permittee shall also furnish to the Agency, upon request, copies of records required to be kept by this permit. (35 IAC 702.148)
12. INSPECTION AND ENTRY. The Permittee shall allow an authorized representative of the Agency, upon the presentation of credentials and other documents as may be required by law, to:
  - a. Enter at reasonable times upon the Permittee's premises where a regulated facility or activity is located or conducted, or where records must be kept under the conditions of this permit;
  - b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
  - c. Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this permit; and
  - d. Sample or monitor, at reasonable times, for the purposes of assuring permit compliance or as otherwise authorized by the appropriate Act, any substances or parameters at any location. (35 IAC 702.149)

13. MONITORING AND RECORDS. (35 IAC 702.150)

- a. Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity. The method used to obtain a representative sample of the waste must be the appropriate method from Appendix A of 35 IAC 721. Laboratory methods must be those specified in Test Methods for Evaluating Solid Waste: Physical/Chemical Methods, SW-846, latest versions; Methods for Chemical Analysis of Water and Wastes, EPA-600/4-79-020, latest versions; or an equivalent method, as specified in the approved Waste Analysis Plan or approved by the Agency.
- b. The Permittee shall retain records of all monitoring information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, copies of all reports and records required by this permit, and records of all data used to complete the application for this permit for a period of at least 3 years from the date of the sample, measurement, report or application. These periods may be extended by request of the Agency at any time. The permittee shall maintain records from all groundwater monitoring wells and associated groundwater surface elevations, for the active life of the facility, and for disposal facilities for the post-closure care period as well.
- c. Records of monitoring information shall include:
  - i. The date(s), exact place, and time of sampling or measurements;
  - ii. The individual(s) who performed the sampling or measurements;
  - iii. The date(s) analyses were performed;
  - iv. The individual(s) who performed the analyses;
  - v. The analytical technique(s) or method(s) used; and
  - vi. The result(s) of such analyses. (35 IAC 702.150)

14. REPORTING PLANNED CHANGES. The permittee shall give notice to the Agency as soon as possible of any planned physical alterations or additions to the permitted facility. For a new HWM facility, the permittee may not commence treatment, storage or disposal of hazardous waste; and for a facility being modified the permittee may not treat, store or dispose of hazardous waste in the modified portion of the facility, until:

- a. The permittee has submitted to the Agency by certified mail or hand delivery a letter signed by the permittee and a registered professional engineer stating that the facility has been constructed or modified in compliance with the permit; and

b.

1. The Agency has inspected the modified or newly constructed facility and finds it is in compliance with the condition of the permit; or
2. If, within 15 days of the date of submission of the letter in paragraph (a), the permittee has not received notice from the Agency of its intent to inspect, prior inspection is waived and the permittee may commence treatment, storage or disposal of hazardous waste. (35 IAC 703.244 and 702.152(a))

15. ANTICIPATED NONCOMPLIANCE. The Permittee shall give advance notice to the Agency of any planned changes in the permitted facility or activity which may result in noncompliance with permit requirements. For a new facility, the permittee shall not treat, store or dispose of hazardous waste; and for a facility being modified, the permittee shall not treat, store or dispose of hazardous waste in the modification portion of the facility, except as provided in Section 703.280, until:

a. The permittee has submitted to the Agency by certified mail or hand delivery a letter signed by the permittee and a registered professional engineer stating that the facility has been constructed or modified in compliance with the permit; and

b. Either:

1. The Agency has inspected the modified or newly constructed facility and finds it is in compliance with the conditions of the permit; or
2. Within 15 days after the date submission of the letter in section a above, the permittee has not received notice from the Agency of its intent to inspect, the permittee may commence treatment, storage or disposal of hazardous waste.

(35 IAC 702.152(b) and 703.247)

16. TRANSFER OF PERMITS. This permit is not transferable to any person except after notice to the Agency. The Agency may require modification of the permit to change the name of the permittee and incorporate such other requirements as may be necessary under the appropriate Act. (See Sections 703.260 and 703.270, in some cases modification is mandatory.) (35 IAC 702.152(c))

17. MONITORING REPORTS. Monitoring results shall be reported at the intervals specified in the permit. (35 IAC 702.152(d))

18. COMPLIANCE SCHEDULES. Reports of compliance or noncompliance with, or any progress reports on, interim and final requirements contained in any compliance schedule of this permit shall be submitted no later than specified in 35 IAC 702.162. (35 IAC 702.152(e))

19. TWENTY-FOUR HOUR REPORTING.

- a. The Permittee shall report to the Agency any noncompliance with the permit which may endanger health or the environment. Any such information shall be reported orally within 24 hours from the time the Permittee becomes aware of the following circumstances. This report shall include the following:
  - i. Information concerning the release of any hazardous waste that may cause an endangerment to public drinking water supplies.
  - ii. Information concerning the release or discharge of any hazardous waste or of a fire or explosion at the HWM facility, which could threaten the environment or human health outside the facility.
- b. The description of the occurrence and its cause shall include:
  - i. Name, address, and telephone number of the owner or operator;
  - ii. Name, address, and telephone number of the facility;
  - iii. Date, time, and type of incident;
  - iv. Name and quantity of material(s) involved;
  - v. The extent of injuries, if any;
  - vi. An assessment of actual or potential hazards to the environment and human health outside the facility, where applicable; and
  - vii. Estimated quantity and disposition of recovered material that resulted from the incident.
- c. A written submission shall also be provided within 5 days of the time the Permittee becomes aware of the circumstances. The written submission shall contain a description of the noncompliance and its cause; the period of noncompliance including exact dates and times and if the noncompliance has not been corrected; the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent recurrence of the noncompliance. The Agency may waive the five day written notice requirement in favor of a written report within fifteen days. (35 IAC 702.152(f) and 703.245(b))

20. OTHER NONCOMPLIANCE. The Permittee shall report all instances of noncompliance not otherwise required to be reported under Standard Conditions 17, 18, and 19, at the time monitoring reports, as required by this permit, are submitted. The reports shall contain the information listed in Standard Condition 19. (35 IAC 702.152(g))
21. OTHER INFORMATION. Where the Permittee becomes aware that it failed to submit any relevant facts in the permit application, or submitted incorrect information in a permit application or in any report to the Agency, the Permittee shall promptly submit such facts or information. (35 IAC 702.152(h))
22. REPORTING REQUIREMENTS. The following reports required by 35 Ill. Adm. Code 724 shall be submitted in addition to those required by 35 Ill. Adm. Code 702.152 (reporting requirements):
  - a. Manifest discrepancy report: if a significant discrepancy in a manifest is discovered, the permittee must attempt to reconcile the discrepancy with the waste generator or transporter. If the discrepancy is not resolved within 15 days after receiving the waste, the permittee must immediately submit to the Agency a letter describing the discrepancy and attempts to reconcile it and a copy of the manifest or shipping paper at issue. (35 IAC 724.172(b))
  - b. Unmanifested waste report: The permittee must submit to the Agency within 15 days of receipt of unmanifested waste an unmanifested waste report on EPA form 8700-13B. (35 IAC 724.176)
  - c. Annual report: an annual report must be submitted covering facility activities during the previous calendar year. (35 IAC 724.175)
23. SUBMITTAL OF REPORTS OR OTHER INFORMATION. All written reports or other written information required to be submitted by the terms of this permit shall be sent to:

Illinois Environmental Protection Agency  
Division of Land Pollution Control #24  
Planning and Reporting Section  
2200 Churchill Road  
Post Office Box 19276  
Springfield, Illinois 62794-9276
24. SIGNATORY REQUIREMENT. All permit applications, reports or information submitted to the Agency shall be signed and certified as required by 35 IAC 702.126. (35 IAC 702.151)

25. CONFIDENTIAL INFORMATION. Any claim of confidentiality must be asserted in accordance with 35 IAC 702.103 and 35 IAC 161.
26. DOCUMENTS TO BE MAINTAINED AT FACILITY SITE. The Permittee shall maintain at the facility, until closure is complete, the following documents and amendments, revisions and modifications to these documents:
- a. Waste analysis plan as required by 35 IAC 724.113(b) and this permit.
  - b. Personnel training documents and records as required by 35 IAC 724.116(d) and this permit.
  - c. Contingency plan as required by 35 IAC 724.153(a) and this permit.
  - d. Closure plan as required by 35 IAC 724.212(a) and this permit.
  - e. Cost estimate for facility closure as required by 35 IAC 724.242(d) and this permit.
  - f. Operating record as required by 35 IAC 724.173 and this permit.
  - g. Inspection schedules as required by 35 IAC 724.115(b) and this permit.
27. WASTE MINIMIZATION. The Permittee shall certify at least annually that the Permittee has a program in place to reduce the volume and toxicity of hazardous waste that he generates to the degree determined by the Permittee to be economically practicable, and the proposed method of treatment, storage, or disposal is that practicable method currently available to the Permittee which minimizes the present and future threat to human health and the environment, in accordance with 35 IAC 724.173(b)(9).

#### GENERAL FACILITY STANDARDS

28. NOTICE OF WASTE FROM A FOREIGN SOURCE. The permittee who has arranged to receive hazardous waste from a foreign source must notify the Regional Administrator in writing at least four weeks in advance of the date the waste is expected at the facility. (35 IAC 724.112(a))
29. NOTICE OF WASTE FROM OFF-SITE. The Permittee who receives hazardous waste from an off-site source (except where the Permittee is also the generator), must inform the generator in writing that the permittee has the appropriate permits for, and will accept, the waste the generator is shipping. The Permittee must keep a copy of this written notice as part of the facility operating record. (35 IAC 724.112(b))

30. GENERAL WASTE ANALYSIS. The Permittee shall comply with the procedures described in the approved waste analysis plan. (35 IAC 724.113)
31. SECURITY. The Permittee shall comply with the security provisions of 35 IAC 724.114(b) and (c).
32. GENERAL INSPECTION REQUIREMENTS. The Permittee shall follow the approved inspection schedule. The Permittee shall remedy any deterioration or malfunction discovered by an inspection as required by 35 IAC 724.115(c). Records of inspections shall be kept as required by 35 IAC 724.115(d).
33. PERSONNEL TRAINING. The Permittee shall conduct personnel training as required by 35 IAC 724.116 and shall maintain training documents and records as required by 35 IAC 724.116(d) and (e).
34. GENERAL REQUIREMENTS FOR IGNITABLE, REACTIVE, OR INCOMPATIBLE WASTE. The Permittee shall comply with the requirements of 35 IAC 724.117.

#### PREPAREDNESS AND PREVENTION

35. DESIGN AND OPERATION OF FACILITY. The Permittee shall maintain and operate the facility to minimize the possibility of fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment. (35 IAC 724.131)
36. REQUIRED EQUIPMENT. The Permittee shall equip the facility with the equipment set forth in the approved contingency plan, as required by 35 IAC 724.132.
37. TESTING AND MAINTENANCE OF EQUIPMENT. The Permittee shall test and maintain the equipment specified in condition 36 as necessary to assure its proper operation in time of emergency. Such testing and maintenance activities are set forth in the approved inspection schedule. (35 IAC 724.133)
38. ACCESS TO COMMUNICATIONS OR ALARM SYSTEM. The Permittee shall maintain access to the communications or alarm system as required by 35 IAC 724.134.
39. REQUIRED AISLE SPACE. The Permittee shall maintain aisle space as required by 35 IAC 724.135 and National Fire Protection Association (NFPA) requirements.
40. ARRANGEMENTS WITH STATE AND LOCAL AUTHORITIES AND EMERGENCY RESPONSE CONTRACTORS. The Permittee shall attempt to make emergency response arrangements with State and local authorities and agreements with State emergency response teams and emergency response contractors and equipment suppliers as required by 35 IAC 724.137. If State or local officials



refuse to enter in preparedness and prevention arrangements with the Permittee, the Permittee must document this refusal in the operating record.

#### CONTINGENCY PLAN

41. IMPLEMENTATION OF PLAN. The provisions of the contingency plan must be carried out by the Permittee immediately whenever there is a fire, explosion or release of hazardous waste or hazardous waste constituents which could threaten human health or the environment (35 IAC 724.151(b)). At a minimum, this includes any fire or explosion which occurs in an area where hazardous waste is being managed (treated, stored or disposed). Within 15 days of any incident that requires implementation of the contingency plan, the owner or operator must submit a written report to the Agency as required by 35 IAC 724.156(j).
42. COPIES OF PLAN. A copy of the contingency plan, including any revisions, must be maintained at the facility and submitted to all local police and fire departments, hospitals and state and local emergency response teams as required by 35 IAC 724.153.
43. AMENDMENTS TO PLAN. The Permittee shall review and immediately amend, if necessary, the contingency plan, as required by 35 IAC 724.154.
44. EMERGENCY COORDINATOR. A trained emergency coordinator shall be available at all times in case of an emergency as required by 35 IAC 724.155 and 724.156.

#### MANIFEST SYSTEM RECORD KEEPING AND REPORTING

45. MANIFEST SYSTEM. The Permittee shall comply with the manifest requirements of 35 IAC 724.171, 724.172 and 724.176.
46. OPERATING RECORD. The Permittee shall maintain a written operating record at the facility in accordance with 35 IAC 724.173.
47. ANNUAL REPORT. The Permittee shall prepare and submit an annual report to the Agency prior to March 1st of each year in accordance with the requirements of 35 IAC 724.175.

#### CLOSURE

48. PERFORMANCE STANDARD. The Permittee shall close the facility as required by 35 IAC 724.211 and in accordance with the approved closure plan.
49. AMENDMENT TO CLOSURE PLAN. The Permittee must amend the closure plan whenever there is a change in the expected year of closure or whenever a change in the facility operation plans or facility design affects the closure plan pursuant to 35 IAC 724.212(c).

50. NOTIFICATION OF CLOSURE. The Permittee shall notify the Agency at least 60 days prior to the date it expects to begin closure. (35 IAC 724.212(d))
51. TIME ALLOWED FOR CLOSURE. After receiving the final volume of hazardous waste, the Permittee shall treat or remove from the site all hazardous waste and complete closure activities in accordance with the schedule(s) specified in the closure plan. (35 IAC 724.213)
52. DISPOSAL AND/OR DECONTAMINATION OF EQUIPMENT. When closure is completed, the Permittee shall decontaminate and/or dispose of all facility equipment and structures as required by the approved closure plan (35 IAC 724.214).
53. CERTIFICATION OF CLOSURE. When closure is completed, the Permittee shall submit certification to the Agency in accordance with 35 IAC 724.215 that the facility has been closed as specified by the approved closure plans.
54. COST ESTIMATE FOR FACILITY CLOSURE. The Permittee's original closure cost estimate, prepared in accordance with 35 IAC 724.242, must be:
  - a. Adjusted for inflation either 60 days prior to each anniversary of the date on which the first closure cost estimate was prepared or if using the financial test or corporate guarantee, within 30 days after close of the firm's fiscal year.
  - b. Revised whenever there is a change in the facility's closure plan increasing the cost of closure.
  - c. Kept on record at the facility and updated. (35 IAC 724.242)
55. FINANCIAL ASSURANCE FOR FACILITY CLOSURE. The Permittee shall demonstrate compliance with 35 IAC 724.243 by providing documentation of financial assurance, as required by 35 IAC 724.251, in at least the amount of the cost estimates required by the previous Permit Condition. Changes in financial assurance mechanisms must be approved by the Agency pursuant to 35 IAC 724.243.
56. LIABILITY REQUIREMENTS. The Permittee shall demonstrate continuous compliance with the requirements of 35 IAC 724.247 and the documentation requirements of 35 IAC 724.251.
57. IN CAPACITY OF OWNERS OR OPERATORS, GUARANTORS, OR FINANCIAL INSTITUTIONS. The Permittee shall comply with 35 IAC 724.248 whenever necessary.

#### LAND DISPOSAL RESTRICTIONS

58. DISPOSAL PROHIBITION. Any waste identified in 35 IAC Part 728, Subpart C, or any mixture of such a waste with nonrestricted wastes, is prohibited from land disposal unless it meets the standards of 35 IAC Part 728, Subpart D, or unless it meets the requirements for exemptions under Subpart C. "Land disposal" means placement in or on the land and includes, but is not limited to, placement in a landfill, surface impoundment, waste pile, injection well, land treatment facility, or vault intended for disposal.
59. DILUTION PROHIBITION. The Permittee shall not in any way dilute a restricted waste or residual from treatment of a restricted waste as a substitute for adequate treatment in order to achieve compliance with 35 IAC 728, Subpart D (35 IAC 728.103).
60. WASTE ANALYSIS.
1. The Permittee must test his waste or extract developed, using the test method identified in Appendix I of 40 CFR Part 268, or use knowledge of the waste, to determine if the waste is restricted from land disposal.
  2. For any waste with treatment standards expressed as concentrations in the waste extract, the Permittee must test the treatment residues or an extract of such residues developed using the test method described in Appendix I of 40 CFR Part 268, to assure that the treatment residues or extract meet the applicable treatment standard.
  3. If the treatment residues do not meet the treatment standards, or if the Permittee ships any restricted wastes to a different facility, the Permittee shall comply with the requirements applicable to generators in 35 IAC 728.107 and 728.150(a)(1).
61. STORAGE RESTRICTIONS
1. The Permittee shall not store hazardous wastes restricted from land disposal under 35 IAC Part 728, Subpart C unless such wastes are stored only in containers or tanks, and are stored solely for the purpose of the accumulation of such quantities as is necessary to facilitate proper recovery, treatment, or disposal, and: (1) each container is clearly marked to identify its contents and the date each period of accumulation begins; (2) each tank is clearly marked to identify its contents, the quantity of each hazardous waste received, and the date each period of accumulation begins, as required by 35 IAC 728.150 or such information is recorded and maintained in the operating records at the facility.

2. The Permittee must comply with the operating record requirements of 35 IAC 724.173.

62. NEW DETERMINATIONS OF PROHIBITED WASTES

Wastes which are prohibited from land disposal under 35 IAC Part 728, Subpart C, or for which treatment standards have been established under 35 IAC 728, Subpart D, subsequent to the date of issuance of this permit, shall be subject to the conditions number 58 through 61 above.

Attachment A

Wastes which can be accepted and  
Hazardous Waste Identification Numbers

ILD093862811

<u>Hazardous Waste No.</u>	<u>Description of Hazardous Waste</u>
A. Characteristically hazardous waste	
D001	Solid waste that exhibits the characteristic of ignitability, but is not listed as a hazardous waste.
D002	Solid waste that exhibits the characteristic of corrosivity, but is not listed as a hazardous waste.
D004	Solid waste exhibiting the characteristic of TCLP toxicity for arsenic at 5.0 mg/l or more.
D005	Solid waste exhibiting the characteristic of TCLP toxicity for barium at 100 mg/l or more.
D006	Solid waste exhibiting the characteristic of TCLP toxicity for cadmium at 1.0 mg/l or more.
D007	Solid waste exhibiting the characteristic of TCLP toxicity for chromium at 5.0 mg/l or more.
D008	Solid waste exhibiting the characteristic of TCLP toxicity for lead at 5.0 mg/l or more.
D009	Solid waste exhibiting the characteristic of TCLP toxicity for mercury at 0.2 mg/l or more.
D010	Solid waste exhibiting the characteristic of TCLP toxicity for selenium at 1.0 mg/l or more.
D011	Solid waste exhibiting the characteristic of TCLP toxicity for silver at 5.0 mg/l or more.
D018	Solid waste exhibiting the characteristic of TCLP toxicity for benzene at 0.5 mg/l or more.
D019	Solid waste exhibiting the characteristic of TCLP toxicity for carbon tetrachloride at 0.5 mg/l or more.
D021	Solid waste exhibiting the characteristic of TCLP toxicity for chlorobenzene at 100.0 mg/l or more.
D022	Solid waste exhibiting the characteristic of TCLP toxicity for chloroform at 6.0 mg/l or more.
D023	Solid waste exhibiting the characteristic of TCLP toxicity for o-cresol at 200.0 mg/l or more.

- D024 Solid waste exhibiting the characteristic of TCLP toxicity for m-cresol at 200.0 mg/l or more.
- D025 Solid waste exhibiting the characteristic of TCLP toxicity for p-cresol at 200.0 mg/l or more.
- D026 Solid waste exhibiting the characteristic of TCLP toxicity for cresol at 200.0 mg/l or more.
- D027 Solid waste exhibiting the characteristic of TCLP toxicity for 1,4 dichlorobenzene at 7.5 mg/l or more.
- D028 Solid waste exhibiting the characteristic of TCLP toxicity for 1,2 dichloroethane at 0.5 mg/l or more.
- D029 Solid waste exhibiting the characteristic of TCLP toxicity for 1,1 dichloroethylene at 0.7 mg/l or more.
- D030 Solid waste exhibiting the characteristic of TCLP toxicity for 2,4 dinitrotoluene at 0.13 mg/l or more.
- D032 Solid waste exhibiting the characteristic of TCLP toxicity for hexachlorobenzene at 0.13 mg/l or more.
- D033 Solid waste exhibiting the characteristic of TCLP toxicity for hexachlorobutadiene at 0.5 mg/l or more.
- D034 Solid waste exhibiting the characteristic of TCLP toxicity for hexachloroethane at 3.0 mg/l or more.
- D035 Solid waste exhibiting the characteristic of TCLP toxicity for methyl ethyl ketone at 200.0 mg/l or more.
- D036 Solid waste exhibiting the characteristic of TCLP toxicity for nitrobenzene at 2.0 mg/l or more.
- D037 Solid waste exhibiting the characteristic of TCLP toxicity for pentachlorophenol at 100.0 mg/l or more.
- D038 Solid waste exhibiting the characteristic of TCLP toxicity for pyridine at 5.0 mg/l or more.
- D039 Solid waste exhibiting the characteristic of TCLP toxicity for tetrachloroethylene at 0.7 mg/l or more.
- D040 Solid waste exhibiting the characteristic of TCLP toxicity for trichloroethylene at 0.5 mg/l or more.
- D041 Solid waste exhibiting the characteristic of TCLP toxicity for 2,4,5 trichlorophenol at 400.0 mg/l or more.

- D042 Solid waste exhibiting the characteristic of TCLP toxicity for 2,4,6 trichlorophenol at 2.0 mg/l or more.
- D043 Solid waste exhibiting the characteristic of TCLP toxicity for vinyl chloride at 0.2 mg/l or more.

B. Hazardous wastes from non-specific sources

- F002 The following spent halogenated solvents: tetrachloroethylene, methylene chloride, trichloroethylene, 1,1,1-trichloroethane, chlorobenzene, 1,1,2-trichloro-1,2,2-trifluoroethane, orthodichlorobenzene, trichlorofluoromethane, 1,1,2-trichloroethane, spent solvent mixtures and blends, and the still bottoms from the recovery of these spent solvents and spent solvent mixtures.
- F003 The following spent non-halogenated solvents: xylene, acetone, ethyl acetate, ethyl benzene, ethyl ether, methyl isobutyl ketone, n-butyl alcohol, cyclohexanone, methanol, spent solvent mixtures and blends, and the still bottoms from the recovery of these spent solvents and spent solvent mixtures.
- F004 The following spent non-halogenated solvents: cresols and cresylic acid, nitrobenzene, spent solvent mixtures and blends, and still bottoms from the recovery of these spent solvents and spent solvent mixtures.
- F005 The following spent non-halogenated solvents: toluene, methyl ethyl ketone, carbon disulfide, isobutanol, pyridine, benzene, 2-ethoxyethanol, 2-nitropropane, spent solvent mixtures and blends, and the still bottoms from the recovery of these spent solvents and spent solvent mixtures.



Attachment B  
Inspection Schedule  
ILD093862811

Table I: General Inspection Schedule  
Security Devices

<u>ITEM</u>	<u>INSPECTION ELEMENT/TYPE OF PROBLEM</u>	<u>INSPECTION FREQUENCY</u>
Fence	. Inspect entire perimeter for breaches or damage	Weekly
Gates	. Check for proper gate lock function	Weekly
Warning Signs	. Check for presence of warning signs	Monthly
Lighting System	. Check lights for operability	Monthly

Table II: General Inspection Schedule,  
Safety & Emergency Equipment

Protective Gear (e.g., Helmets, Face Shields, Goggles, Boots, Gloves, Acid Resistent Clothing, Disposable Suits, Disposable Bags*)	. Check accessibility	Monthly
	. Check for adequate supply	Monthly
	. Check for deterioration, damage	Monthly
First Aid Kits	. Check accessibility	Monthly
	. Check for adequate supply	Monthly
Emergency Showers	. Check that units activate and shut off properly	Weekly
	. Check accessibility	Weekly
Internal (Phone or Radio)/External (Phase) Communications Systems	. Check accessibility	Weekly
	. Check for operations	Monthly
Fire Extinguishers	. Check pressure gauge for full charge indication	Monthly
	. Check inspection tag to insure annual maintenance by outside fire service is up-to-date	Monthly

<u>ITEM</u>	<u>INSPECTION ELEMENT/TYPE OF PROBLEM</u>	<u>INSPECTION FREQUENCY</u>
	. Check seal to ensure no one has used extinguisher	Monthly
	. Check to ensure access to units is not blocked	Weekly
Absorbent Supply	. Check for adequate supply	Weekly
Recovery Drums	. Check for adequate supply	Weekly
Other Emergency and Decontamination Equipment	. Check accessibility	Weekly
	. Check for adequate supply	Monthly
	. Check for deterioration/damage	Monthly
Alternate power supply for alarm system	. Check for disconnection or low charge	Monthly
Respirators and cartridges	. Check for adequate supply	Monthly
Fire department pull stations	. Check for operability and accessibility, location signs	Monthly

Table III: Tank Farms Inspection Schedule

Storage Tanks Containment Area	. Check for evidence of spilled materials	Each Operating Day
	. Check for cracks and gaps in, or damage to containment base, sumps and drains, and their coatings	Each Operating Day
	. Check for evidence of seepage outside containment (e.g. discoloration)	Each Operating Day
	. Check for debris, cleanup residue, improperly stored equipment	Each Operating Day

<u>ITEM</u>	<u>INSPECTION ELEMENT/TYPE OF PROBLEM</u>	<u>INSPECTION FREQUENCY</u>
Storage Tanks	. Inspect tank exterior for cracks, leaks, discoloration, and obvious deformation	Each Operating Day
	. Check tank integrity	Annually
Access Hatches, Vents, and Sampling Ports	. Check for leaks	Each Operating Day
	. Check for damage	Each Operating Day
Fill/Drain and Overflow Piping	. Inspect piping for leaks	Each Operating Day
	. Inspect valve seals for leaks	Each Operating Day
	. Check that handles are not bent or damaged	Each Operating Day
Liquid Levels	. Check if operators log book is up to date	Each Operating Day
	. Check tank liquid level indicators for operability	Each Operating Day
All Ancillary Equipment	. Visual inspection for leaks	Each Operating Day
	. Conduct leak test or approved integrity assessment	Annually
Tank Truck loading/ Unloading Area	. Check for evidence of spills or releases in unloading area	Each Operating Day
	. Check for removal of spill absorbent and cleanup materials	Each Operating Day
	. Check sump, grating and curbs for cracks or other damage	Each Operating Day
	. Inspect hoses for deterioration or leakage	Each Operating Day
	. Inspect hose couplings and valves for leakage	Each Operating Day
	. Inspect containment system for deterioration	Weekly

Table IV: Container Storage Area Inspection Schedule

<u>ITEM</u>	<u>INSPECTION ELEMENT/TYPE OF PROBLEM</u>	<u>INSPECTION FREQUENCY</u>
Container Storage	. Check for evidence of spilled material on slab, ramps, drains, sumps	Daily
	. Check for removal of absorbent materials and cleanup rags	Daily
	. Check for, cracks and gaps in, or damage to, containment bases, sump and drains and coatings	Weekly
	. Check for erosion, uneven settlement, etc.	Weekly
	. Check for corrosion of grating over drains and sumps	Weekly
	. Check for condition and availability of overpack containers	Weekly
Stored Containers	. Check for drum leaks or swelling	Daily
	. Check that drums are not open	Daily
	. Check for proper placement	Daily
	. Check adequacy of aisle space	Daily
	. Check height of stacks	Daily
	. Check capacity not exceeded	Daily
	. Check for proper labeling	Daily

ATTACHMENT C  
CLOSURE CERTIFICATION FORM  
ILD093862811

This statement is to be completed by both the responsible officer and by the registered professional engineer upon completion of closure. Submit one copy of the certification with original signatures and three additional copies.

Closure Certification Statement

The hazardous waste management TOI units at the facility described in this document have been closed in accordance with the specifications in the approved closure plan. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

\_\_\_\_\_  
USEPA ID Number

\_\_\_\_\_  
Facility Name

\_\_\_\_\_  
Signature of Owner/Operator

\_\_\_\_\_  
Name and Title

\_\_\_\_\_  
Signature of Registered P.E.

\_\_\_\_\_  
Name of Registered P.E. and Illinois  
Registration Number

\_\_\_\_\_  
Date

ATTACHMENT D  
ADDITIONAL SPECIAL CONDITIONS  
ILD093862811



## ADDITIONAL SPECIAL CONDITIONS

### I. Receipt Analysis

- A. The Permittee shall take one sample of immersion cleaner from every tenth generator that ships wastes to the Pekin Service Center and conduct flash point analysis on that sample. If the analysis indicates that the immersion cleaner is characteristically ignitable, the generator's shipment of immersion cleaner that contained the ignitable immersion cleaner shall be stored as ignitable.
- B. All used oil which contains greater than 1,000 ppm halogens which cannot be adequately rebutted are hazardous wastes and must be handled accordingly (i.e., they cannot be processed into an on-specification or off-specification used oil fuel).

### II. Reporting Requirements

- A. Any incident which requires implementation of the contingency plan shall be recorded in the facilities operating record in an incident log which is maintained in a distinct section of the facilities operating records. The incident log must include a copy of each incident report. The incident report must include, at a minimum, the waste management units involved in the incident, the cause of the release, measures taken to correct the situation and prevent a reoccurrence in addition to the information identified in the approved application.

### III. Closure

- A. At least 180 days prior to closure of any hazardous waste management unit at this facility the permittee shall submit a closure plan modification to insure closure complies with the current Agency standards in effect at the time of closure.

### IV. General Operating Requirements

- A. Within 60 days of the effective date of this permit, the Permittee shall submit a certification from a qualified, licensed, independent engineer that the 10,000 gallon horizontal tank and piping have been painted in accordance with the recommendations made by Questec Corporation in the installation assessment of the used antifreeze storage tank system dated April 14, 1993 and submitted as Exhibit D-8a of the approved permit application.

The Permittee shall not store antifreeze in this tank until the certification identified above is reviewed and approved by the Agency. The Agency shall inspect the tank and renew and respond to the certification within 30 days. If the Agency has not inspected the tank or responded to the certification within 30 days, Safety Kleen may deem certification approved.

- B. Storage of transfer wastes that have been stored on site for greater than ten days is prohibited. This activity is a violation of the RCRA Part B Permit. If such a violation occurred in each storage unit in which the transfer waste was stored, each unit in which the violation occurred would be required to obtain a RCRA permit or to undergo closure at that time.

V. Contingency Plan

- A. The contingency plan must be implemented whenever there is a fire, explosion or spill which involves hazardous waste or which occurs in areas where hazardous waste is treated or stored. This includes spills within the containment system. A spill is any release of material outside the permitted unit, into or outside of the containment system.
- B. The Permittee shall contact the local emergency response entities immediately after implementation of the contingency plan unless the spill is less than one pound of waste immersion cleaner, or 50 gallons of spent antifreeze or spent mineral spirits and it is immediately contained and cleaned up.
  - 1. The entities which must be notified include:
    - a. Police Department
    - b. Cincinnati Township Fire Department
    - c. Pekin Memorial Hospital
    - d. IESDA (IEMA)
    - e. National Response Center
    - f. DLPC, FOS -- Peoria Region (within 24 hours)
  - 2. The information which must be initially relayed to each entity includes:
    - a. The type of emergency (release, fire or explosion);
    - b. The type of wastes involved in the emergency and the approximate quantity involved;
    - c. An initial assessment of the conditions at the site; and whether outside help is needed to properly respond to the situation.

3. If the Permittee is able to properly respond to the emergency without any aid from the entities identified in Condition 2.a above, the Permittee shall notify each of these entities that the emergency situation no longer exists once all required emergency response and cleanup activities have been completed.
- C. Within 60 days of the effective date of this permit, the Permittee shall demonstrate to the Agency that the following information has been provided to the local fire department, the local police department and all other agencies identified in 35 IAC 724.153(b) (Note that this information must be provided to these entities to ensure the requirements of 35 IAC 724.137 are met):
1. A list of all hazardous wastes to be managed at the facility (generic name) including the USEPA hazardous waste number;
  2. A scaled drawing showing the location of all hazardous waste management units at the facility and all other areas where waste is managed at the facility (such as loading/unloading areas, etc.). This scaled drawing must also identify the entrances to the facility, roads within the facility and possible evacuation routes;
  3. A description of the types of waste managed at each hazardous waste management unit at the facility;
  4. A description of the procedures used to handle waste at the facility;
  5. An estimate of the quantity of the various types of waste which may be present at the facility. An estimate of the typical inventory of wastes at the facility must also be included;
  6. The following information regarding the properties of the wastes managed at the facility:
    - Name
    - USEPA Hazardous Waste Number
    - CAS Number
    - IDLH
    - TLVs (TLV-TWA, TLV-STEL, TLV-C)
    - Boiling Point (if applicable)
    - Vapor pressure at two temperatures
    - NFPA Designation (flammable or combustible)
    - Material Safety Data Sheets
    - Other appropriate characteristics (such as reactive class, etc.)
    - USDOT classification

7. An identification of the products of incomplete combustion associated with (1) flammable or combustible hazardous wastes managed at the facility and (2) wastes managed at the facility which are hazardous due to the characteristic of ignitability (D001).
- D. Within sixty (60) days of the effective date of this permit the Permittee shall provide documentation to the Agency that the agreements and arrangements identified below have been made. Where necessary, documentation must be provided that any agency identified in 35 IAC 724.153(b) declined to enter an agreement or arrangement. The specific arrangements and agreements which must be made include:
1. Arrangements to familiarize the local police department, local fire departments and other local emergency response teams with the layout of the facility, properties of hazardous wastes handled at the facility and associated hazards, places where facility personnel would normally be working, entrances to and roads inside the facility and possible evacuation routes.
  2. Agreements designating primary emergency authority to a specific police department and a specific fire department, where more than one police department and fire department might respond to an emergency. Agreements should also be made with the other surrounding police and fire departments to provide support to the primary emergency authorities;
  3. Agreements with state emergency response teams, emergency response contractors and equipment suppliers;
  4. Arrangements to familiarize local hospitals with the properties of the hazardous wastes handled at the facility and the types of injuries or illnesses which could result from fires, explosions or releases at the facility;
  5. Arrangements to identify a single local emergency response agency as the primary agency which will coordinate activities required by these agencies during an emergency at the facility.

The facility should also attempt to develop emergency plans and coordination agreements with the state and local emergency entities identified above. The detail of the arrangements made with the local and state emergency entities will be dependent upon the types of waste handled at the facility and the potential need for the services of the various entities.

- E. The Permittee shall review all components of the contingency plan with the local emergency response entities within 12 months of the effective date of the permit and each year afterwards. Copies of the meeting's notes and list of attendees shall be placed in the facility's operating record and be available to the Agency for review upon verbal or written request.
- F. Within ninety (90) days of effective date of this permit, the Permittee shall update the closure cost estimate for each permitted container storage unit and each tank storage unit to account for analyzing all sweepings and washwater and rinsate generated during closure.

#### VI. Corrective Action

- A. The Agency review of the Corrective Action Plan will be subject to the appeal provisions contained in Section 40 of the Illinois Environmental Protection Act.

#### VII. Financial Assurance

Financial assurance for the amount identified in Attachment G shall be submitted within 30 days of the effective date of this permit.

ATTACHMENT E

REQUIRED SCOPE OF WORK FOR A RCRA  
FACILITY INVESTIGATION

ILD093862811

Scope of Work for a RCRA Facility Investigation  
Safety-Kleen Corporation  
ILD093862811  
LPC #1790600011  
Part B Log #96

This Scope of Work relates specifically to the RCRA Facility Investigation (RFI) of the solid waste management units identified in Section IV of this RCRA Permit, which the Permittee is required to perform under the terms of their RCRA permit. In this Scope of Work, "Agency's DLPC" refers to the Illinois Environmental Protection Agency's Division of Land Pollution Control, "Permittee" refers to Safety Kleen Corporation and "SWMU" refers to Solid Waste Management Unit.

I. PURPOSE

The purpose of the RFI is to determine the nature and extent of releases of hazardous waste or hazardous constituents, if any, from SWMUs located at the facility and to gather data necessary to prepare a Corrective Action Plan (CAP). Specifically, the information gathered during the RFI will be used to help determine the need, scope and design of a corrective action program.

II. SCOPE OF WORK

The Scope of Work for the RFI is divided into three phases -- Phase I, II and III.

1. The purpose of Phase I is to provide information on the characteristics and integrity of each unit and conduct field activities, as necessary, to determine if a SWMU has released, is currently releasing, or has the potential to release hazardous waste and/or hazardous constituents to the soil or air which may be impacted for that SWMU.
2. Phase II of the RFI will be required if the Agency's DLPC determines from the data obtained in Phase I that, for any SWMU, (1) a release has occurred to the soil or air, (2) a release is occurring to the soil or air, or (3) the results are inconclusive. The purpose of Phase II is to define the extent of releases to the soil or air from these SWMUs.
3. Phase III will be required if the Agency's DLPC determines from the data obtained in Phase II that hazardous wastes or hazardous constituents may have migrated to the groundwater. The purpose of Phase III is to define the extent of releases both on-site and off-site to the ground water from SWMUs identified in Phase I or II to have potentially released hazardous waste or hazardous constituents to the groundwater.

Each phase of the investigation is divided into three subparts. The first subpart deals with the development of a RFI Workplan by the Permittee. The second subpart is the implementation of the RFI. The final subpart covers the submission of reports of activities and results of the RFI.

### III. RFI WORKPLANS

The Permittee shall prepare a detailed workplan for each phase of the RFI which contains detailed background information related to the facility and the SWMUs listed in Condition B.1 of Section IV of the permit and which describes procedures for each phase of the RFI in accordance with the schedule in Section IV of the permit. The RFI Workplan must, at a minimum, contain the information identified in III.A-III.H below. The information in the workplan must be presented in a manner which is similar to the format set forth in these sections. Information provided in each Phase of the RFI may be incorporated into the workplan for the subsequent Phase by reference. Information already submitted in the Part B permit application may also be incorporated by reference into the workplans when appropriate.

#### A. GENERAL FACILITY INFORMATION

The following information must be provided (to the extent known) in the Phase I RFI Workplan regarding the facility overall:

1. A description of the facility, including the nature of its business, both past and present. This description should identify (1) the size and location of the facility, (2) the raw materials used and products manufactured at the facility, and (3) the Standard Industrial Code which describes the type of activities carried out at the facility;
2. Identification of past and present owners;
3. A discussion of the facility's past and present operations, including solid and hazardous waste generation, storage, treatment and disposal activities;
4. A brief discussion of each of the SWMUs identified in Condition B.1 of Section IV of this permit;
5. A description of all significant surface features (ponds, streams, depressions, etc.) and wells within 1,500 feet of the facility;
6. A description of all land usage within 1,500 feet of the facility, including all known SWMUs;



7. Identification of all human populations and environmental systems susceptible to contaminant exposure from releases from the SWMUs within a distance of at least 1,500 feet of the facility;
8. A description of any interim corrective action measures which were or are being planned or undertaken at the facility;
9. Approximate dates or periods of past spills or releases, identification of material spilled, amount spilled, location, and a description of the response actions, including any inspection reports or technical reports generated as a result of the spill or release.
10. A current topographic map(s) showing a distance of at least 1,500 feet around the facility and other information described below, and at a scale of one inch equal to not more than 200 feet. Contours shall be shown on the map, with the contour interval being sufficient to clearly show the pattern of surface water flow. If such a map is not available, the workplan shall describe the method for generating the map for inclusion in the Phase I report. The map shall clearly show the following:
  - a. Map scale, North arrow, date, and location of facility with respect to Township, Range and Section;
  - b. Topography and surface drainage depicting all waterways, wetlands, 100-year floodplain, drainage patterns, and surface water areas;
  - c. Property lines, with the owners of all adjacent property clearly indicated;
  - d. Surrounding land use;
  - e. Locations and boundaries of (1) all solid waste, including hazardous waste, management units, both past and present, (2) spill areas and (3) other suspected areas of contamination;
  - f. All injection and withdrawal wells; and
  - g. All buildings, tanks, piles, utilities, paved areas, easements, rights-of-way, and other features including all known past and present product and waste underground tanks or piping.

The map(s) shall be of sufficient detail and accuracy to locate and report all current and future RFI work performed at the site. The base map(s) shall be submitted in the Phase I report and modified in subsequent reports and workplans as appropriate.

B. NATURE AND EXTENT OF CONTAMINATION

The Phase I Workplan must contain the following information, to the extent known, for each of SWMUs identified in Condition B.1 of Section IV of the permit:

1. Location of unit/area;
2. The horizontal and vertical boundaries of each unit/area;
3. Details regarding the construction, operation and structural integrity of each unit/area;
4. A description of all materials managed and/or disposed at each SWMU including, but not limited to, solid waste, hazardous wastes, and hazardous constituents to the extent they are known or suspected over the life of the facility including:
  - (a) Type of waste or hazardous constituents placed in the units, including source, hazardous classification, quantity and chemical composition;
  - (b) Physical and chemical characteristics, including physical form, physical description, general chemical class, and cohesiveness of the waste;
5. Quantities of solid and hazardous wastes managed by the unit;
6. The history of the utilization of each SWMU and the surrounding areas, including the period of operation and age of the unit;
7. Methods used to close the unit, if applicable;
8. All available data and qualitative information on the level of contamination present at the SWMU;
9. A description of the existing degree and extent of contamination at each unit area;
10. Identification of additional information which must be gathered regarding 1 thru 9 above;

C. ADMINISTRATIVE OUTLINE

The Permittee shall submit as part of each Phase Workplan a general outline defining the RFI objectives, technical approach, and scheduling of tasks during that phase of the RFI. The Permittee shall prepare a Project Management Plan as part of each Phase Workplan which will include a discussion of the technical approach, schedules, budget, and personnel. The Project Management Plan must also include a description of the qualifications of personnel performing or directing the RFI, including contractor personnel. This plan shall also document the overall management approach to the current Phase of the RFI.

D. SITE-SPECIFIC SAMPLING PLANS

The Permittee shall prepare detailed site-specific sampling plans for each phase of the RFI which address all field activities needed to obtain site-specific data. The plans must contain: a statement of sampling objectives, specifications of equipment, analyses of interest, sample types, sample locations and schedules for sampling. Wherever appropriate, Test Methods for Evaluating Solid Wastes, Third Edition, (SW-846), including Final Update I, sampling, analysis, and statistical methods shall be utilized. The plans must address all levels of the investigations, as well as types of investigations conducted on specific environmental media (i.e., soil, air, surface water, groundwater). The plans must describe in detail how each phase of the RFI will be implemented.

1. Phase I Sampling and analysis Plan

The Phase I Sampling and Analysis Plan must describe methods to determine whether any of the SWMUs to be investigated have released or are currently releasing hazardous waste or hazardous constituents into the environment. This Phase I Sampling Plan shall be submitted as part of the RFI Phase I Workplan. The workplan must contain procedures for a:

a. Soils Investigation

The Phase I Workplan must provide for a determination of the presence or absence of releases of hazardous waste and hazardous constituents into the soil around and under each SWMU which must be investigated, based upon the information present in the Phase I Work Plan. To meet this requirement, the workplan must identify:

- (1) The procedures which will be used to describe and characterize the soils in and around the subject SWMU(s) down to the water table, including, but not limited to the following:
  - (a) Unified soil classification;
  - (b) Soil profile; and
  - (c) Elevation of water table;
- (2) The parameters and hazardous constituents to be used to establish the presence or absence of a plume of contamination. These must include, but are not limited to, specific hazardous constituents of wastes known or suspected to have been managed by the SWMU(s) as identified and determined by the unit characterization information presented in the work plan;
- (3) The basis for selecting the parameters and constituents in (3) above;
- (4) The methodology for choosing sampling locations, depths, and numbers of samples;
- (5) Sampling procedures for each parameter or constituent to be analyzed. All soil samples taken must be handled in accordance with 40 CFR 261, Appendix III and the Agency's DLPC soil volatile sampling procedure if volatiles are to be analyzed. All other environmental media samples must be collected and handled in accordance with EPA approved and standardized methods for evaluation of solid wastes;
- (6) Analytical methods to be used in the analysis of the samples. If any of these methods is not consistent with those specified in Test Methods for Evaluating Solid Waste, Physical/Chemical Methods (U.S. EPA SW-846), a complete description of the methods to be used and the justification for not using the appropriate SW-846 methods must be provided, and
- (7) Procedures and criteria for evaluating analytical results to establish the presence or absence of any contamination.

2. Phase II Sampling and analysis Plan

The Phase II Sampling and Analysis plan, if necessary, must describe procedures to determine the nature and extent of hazardous waste and/or hazardous constituents released to the soil. This workplan shall address and/or include, at a minimum:

- (1) A description of what is known about the horizontal and vertical extent of contamination;
- (2) A description of relevant contaminant and environmental chemical properties within the affected source area and plume, including solubility, specific absorption, leachability, exchange capacity biodegradability, hydrolysis, photolysis, oxidation and other factors that might affect contaminant migration and transformation (if known);
- (3) Specific contaminant concentrations, if known;
- (4) The horizontal and vertical velocity and direction of contaminant movement (if known);
- (5) An extrapolation of future contaminant movement (if known);
- (6) The methods and criteria to be used to define the boundaries of the plume(s) of contamination;
- (7) The parameters and constituents to be used to establish the presence or absence of a plume of contamination. This must include, but need not be limited to, specific hazardous constituents of wastes known or suspected to have been placed in the SWMUs;
- (8) The basis for selecting the parameters and constituents in 7 above;
- (9) The methodology for choosing sampling locations depths, and numbers of samples;
- (10) Sampling procedures for each parameter or constituent to be analyzed;
- (11) Analytical methods to be used in the analysis of the samples. If any of these methods are not identical to those specified in Test Methods for Evaluation Solid Waste. Physical/Chemical Methods, (US EPA SW-846), a complete description of the methods to be used and the justification for not using the SW-846 methods shall be provided; and

- (12) Procedures and criteria for evaluating analytical results to establish the presence or absence of any plume of contamination.

3. Potential Receptors

If (1) a release to air or groundwater is detected, or (2) the Permittee desires to establish site-specific soil cleanup objectives, then the subsequent RFI Phase Report must provide data describing the human populations and environmental systems within a radius of 1,500 feet of the facility boundary that may be affected by releases from SWMUs must be collected and submitted to the Agency. The following characteristics shall be identified.

- a. Local uses and possible future uses of groundwater:
  - (1) type of use (e.g. municipal or residential drinking water source, industrial, etc.); and
  - (2) location of groundwater users, including wells and discharge areas.
- b. Local uses and possible future uses of surface waters draining from the facility:
  - (1) Domestic and municipal;
  - (2) Recreational;
  - (3) Agricultural;
  - (4) Industrial; and
  - (5) Environmental.
- c. Human use of, or access to, the facility and adjacent lands, including, but not limited to:
  - (1) Recreation;
  - (2) Agriculture;
  - (3) Residential;
  - (4) Commercial;
  - (5) Zoning; and

- (6) Location between population locations and prevailing wind direction.
- d. A description of the biota in surface water bodies on, adjacent to, or affected by the facility.
- e. A description of ecology of, and adjacent to the facility.
- f. A demographic profile of the people who use or have access to the facility and adjacent land, including, but not limited to: age, sex, and sensitive subgroups.
- g. A description of any endangered or threatened species near the facility.

4. Phase III - Hydrogeologic and Hydrologic Investigation

The potential for releases to groundwater from a given SWMU must be investigated as part of Phase III of the RFI if the Agency's DLPC determines from the data obtained during the RFI Phase II investigation that releases to soil from a given SWMU may have migrated to the groundwater below the site, or the data is inconclusive. The RFI Phase III hydrogeologic and geologic investigation plan must provide descriptions of groundwater monitoring systems which will provide adequate data on the detection, nature, extent and rate, and concentration of any releases to groundwater or surface water.

Groundwater monitoring will not be required for a SWMU during the RFI Phase III investigation, if the Permittee can demonstrate, based upon the data obtained from the soils investigation under the RFI Phase I environmental media investigation that no releases have occurred from the SWMU(s), or, based upon the data obtained from the rate and extent evaluation under the RFI Phase II investigation that contaminants from the subject SWMU(s) have not entered the groundwater. The Agency reserves the right to require a groundwater monitoring program for SWMUs based upon interim or final corrective measures chosen, provided that the corrective measures call for on-site final disposition of contamination or long term remedial activities.

If releases of hazardous waste or hazardous constituents have entered the groundwater at a particular SWMU, the RFI Phase III Workplan shall address a hydrological investigation and groundwater monitoring for a SWMU or group of SWMUs at the time the Agency notifies the Permittee that a RFI Phase III Workplan is required. This workplan must include:

- a. Information, as it is available, regarding:
- (1) The regional geologic and hydrogeologic characteristics in the vicinity of the facility, including stratigraphy, hydrogeologic flow and the areas of recharge and discharge;
  - (2) Any topographic or geomorphic features that might influence the groundwater flow system;
  - (3) The hydrogeologic properties of all of the hydrogeologic units found at the site down to the first bedrock aquitard, including: hydraulic conductivity and porosity, texture, uniformity and lithology; and interpretation of hydraulic interconnections between saturated zones; and zones of significant fracturing or channeling in the unconsolidated and consolidated deposits;
  - (4) Using the facility map as a base, isopach and structural contour maps, and at least two (2) geologic cross sections showing the extent (depth, thickness, lateral extent) of all hydrogeologic units within the facility boundary, down to the first bedrock aquitard, identify: all units in the unconsolidated and consolidated deposits; zones of higher permeability or lower permeability that might direct or restrict the flow of contaminants; perched aquifers; and the first saturated zone that may have a potential for migration of contaminants;
  - (5) The water level or fluid pressure monitoring, including: water level contour maps and vertical gradient sections, well or piezometer hydrographs and interpretation of the gradient sections, well or piezometer hydrographs and interpretation of the flow system, interpretation of any changes in hydraulic gradients, and seasonal fluctuation; and
  - (6) Any man-made influences that may affect the hydrogeology of the site, identifying local water supply and production wells and other man-made hydraulic structures within 1500 feet of the facility boundary.
- b. Procedures for obtaining information identified in III.D.4.a above which was not obtained during preparation of the workplan.



- c. Documentation that sampling and analysis of groundwater monitoring wells will be carried out in accordance with the approved Data Collection Quality Assurance Plan as required in III.F. below. The plan shall provide information on the design and installation of all groundwater monitoring wells. The designs shall be in accordance with the latest version of the Technical Enforcement Guidance Document (TEGD) where appropriate, and the latest version of the Agency's DLPC design criteria. At a minimum:
- (1) The groundwater monitoring wells must consist of monitoring wells installed in the uppermost aquifer and in each underlying aquifer (e.g., sand units) which are hydraulically interconnected;
  - (2) At least one background monitoring well in each aquifer shall be installed hydraulically upgradient (i.e., in the direction of increasing static head) from the limit of the SWMUs, except to the extent that SWMUs in close proximity can be investigated with the same background well system. The number, locations, and depths must be sufficient to yield groundwater samples that are: (a) representative of background quality in the uppermost aquifer and units hydraulically interconnected beneath the facility; and (b) not affected by SWMUs at the subject facility; and
  - (3) Monitoring wells in each appropriate aquifer shall be installed hydraulically downgradient (i.e., in the direction of decreasing static head) at the limit of the SWMU or at the limit of each group of proximate SWMUs. Their number, locations and depths must ensure that they allow for detection of releases of hazardous waste or hazardous constituents from the SWMU(s).
- d. A sampling plan which specifies:
- (1) The parameters and constituents to be used to establish the presence or absence of a plume of contamination. These must include, but need not be limited to, specific hazardous constituents of wastes determined to have been placed in or released from the SWMUs (including any possible degradation products);

- (2) The basis for selecting the parameters and constituents in (1) above;
- (3) The methodology for investigating the hydrostratigraphic units at site, and the locations, depths, and concentration specifications for each monitoring well;
- (4) Sampling procedures for each parameter or constituent to be analyzed, including sampling frequency;
- (5) Analytical methods to be used in the analysis of the samples. If any of these methods is not consistent with those specified in Test Methods for Evaluating Solid Waste, Physical/Chemical Methods (U.S. EPA SW-846), a complete description of the methods to be used and the justification for not using the appropriate SW-846 methods shall be provided; and
- (6) Procedures and criteria for evaluating analytical results to establish the presence or absence of any plume of contamination.

If the Agency's DLPC determines from the data obtained during the Phase III investigation that releases of hazardous waste or hazardous constituents have occurred to the groundwater or that the data are inconclusive, the Permittee will be required to submit a Groundwater Monitoring Plan to determine the vertical and horizontal distribution of the contaminants identified and to produce the long-term disposition of the contaminants. This groundwater monitoring program will require proposals for establishing the locations, depths, and construction specifications for additional monitoring wells necessary to delineate the extent of any plume. The methodology of the investigation, the sampling procedures, analytical methods, and procedures for evaluating analytical results to establish the extent of the plume shall be the same as above unless specifically identified in the Phase III workplan. The Groundwater Monitoring Plan must also specify the criteria which will be used to determine the limits of the plume.

E. DATA COLLECTION QUALITY ASSURANCE

The Permittee shall prepare a plan to document all monitoring procedures, sampling, field measurements, and sample analysis performed during the investigation so as to ensure that all

information, data and resulting decisions are technically sound, statistically valid, and properly documented. This shall be submitted with each Phase Workplan.

Quality Assurance. Sampling methods and equipment, as well as laboratory analytical methods, shall follow guidance in U.S. EPA's SW-846, "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods" (see 40 CFR 260.11) if appropriate. All field sampling methods not included in SW-846 must be approved by the Agency's DLPC before they are used in the RFI. This includes methods such as drilling, borings, etc. When applicable, standard procedures, as defined by U.S. EPA, IEPA or ASTM, should be followed. All soil samples which are to be taken must be handled in accordance with 40 CFR, Part 261, Appendix III and the Agency's soil volatile sampling procedures if volatile sampling is required. The analytical methods which will be used must be specified and must be approved by the Agency before they are implemented.

F. DATA MANAGEMENT PLAN

The Permittee shall develop and initiate a Data Management Plan to document and track investigation data and results. This Plan shall identify and set up data documentation materials and procedures, project file requirements, and project-related progress reporting procedures and documents. The Plan shall also provide the format to be used to present the raw data and conclusions of the investigation(s). This plan shall be submitted with each Phase Workplan.

G. IMPLEMENTATION OF INTERIM MEASURES

At any time during the RFI the Permittee may initiate interim measures for the purpose of preventing continuing releases and/or mitigating the results of releases and/or mitigating the migration of hazardous wastes or hazardous constituents. It shall not be necessary to conduct all phases of the RFI investigation if the Agency's DLPC and the Permittee agree that a problem can be corrected, or a release cleaned up, without additional study and/or without a formal CMS.

The Permittee shall submit information on any past or ongoing interim measures which have been or are to be undertaken to abate threats to human health and the environment to the Agency's DLPC for approval. This information shall include, at a minimum:

1. Objectives of the interim measures: how the measure is mitigating a potential threat to human health and the environment and/or is consistent with and integrated into any long term solution at the facility;

2. Design, construction, and maintenance requirements;
3. Schedules for design and construction; and
4. Schedules for progress reports.

If the Agency's DLPC determines that a release cannot be addressed without additional study and/or a formal CMS then the Agency's DLPC will notify the Permittee that these must be performed. Any proposal made under this provision or any other activity resulting from such proposal, including the invocation of dispute resolution, shall not affect the schedule for implementation of the RFI or of any other portion of the permit.

If the Agency determines that interim measures are necessary to protect human health or the environment, the Permittee will be notified by way of a permit modification.

#### H. HEALTH AND SAFETY PLAN

Under the provisions of 29 CFR 1910 (54 FR 9,295, March 6, 1989), cleanup operations must meet the applicable requirements of OSHA's Hazardous Waste Operations and Emergency Response standard. These requirements include hazard communication, medical surveillance, health and safety programs, air monitoring, and decontamination and training. General site workers engaged in activities that expose or potentially expose them to hazardous substances must receive a minimum of 40 hours of safety and health training off site plus a minimum of three days of actual field experience under the direct supervision of a trained experienced supervisor. Managers and supervisors at the cleanup site must have at least an additional eight hours of specialized training on managing hazardous waste operations. These requirements must be met during each phase of the RFI.

#### IV. IMPLEMENTATION OF RFI

The Permittee shall conduct those investigations necessary to characterize the site, and to determine the nature, rate and extent of migration, and concentrations of hazardous waste and hazardous constituents, if any, released from the SWMU's into the surface water and sediments, groundwater, air, and soil. The investigations must be of adequate technical content to support the development and evaluation of a corrective action program, if one is deemed necessary by the Agency's DLPC.

The investigation activities shall follow the plans and procedures set forth in the Workplan(s) and the RFI schedule. Any actual or anticipated deviations from the Workplan(s) or the RFI schedule shall be reported no

later than the time of submission of the next quarterly report required by Section V subsequent to the determination of need or actual deviation from the Workplan.

V. SUBMISSION OF REPORTS AND RESULTS OF RFI ACTIVITIES

The Permittee must prepare and submit quarterly progress reports and a final report on the activities and results of each Phase of the RFI activities as appropriate. The progress reports shall contain at a minimum:

1. An estimate of the percentage of the investigation completed;
2. Summary of activities completed during the reporting period;
3. Summaries of all actual or proposed changes to the Workplan or its implementation;
4. Summaries of all actual or potential problems encountered during the reporting period;
5. Proposal for correcting any problems;
6. Projected work for the next reporting period; and
7. Other information or data as requested in writing by the Agency's DLPC.

The workplans and reports which must be submitted to the Agency for review and approval in accordance with the schedule set forth in the following table:

<u>Facility Action</u>	<u>Due Date</u>
Submission of RFI Phase I Workplan	Within 120 days after effective date of the permit
Completion of RFI Phase I investigation and submission of Phase I Report and Summary	To be specified in the Phase I Workplan
Submission of RFI Phase II Workplan	Within 90 days after notification of the need of Phase II by Agency's DLPC
Completion of RFI Phase II investigation and submission of Phase II Report and Summary	To be specified in the Phase II workplan

ILD093862811  
Part B Log No. 96  
Page E-16 of E-16

Submission of RFI Phase III Workplan

Within 90 days after  
notification of the need  
for Phase III

Completion of RFI Phase III investigation and  
submission of Phase III Report and Summary

To be specified in the  
Phase III Workplan

Periodic Progress Reports

To be specified in  
workplans

ATTACHMENT F

APPROVED RCRA PERMIT APPLICATION IDENTIFICATION

ILD093862811

Approved RCRA Permit Application Identification  
Safety-Kleen Pekin Service Center  
ILD093862811

<u>Section</u>	<u>Approved Section Edition</u>
A. Part A Application	5/13/93
B. Facility Description	4/26/93
C. Waste Characteristics	4/26/93
D. Process Information	4/26/93
E. Groundwater Monitoring	4/26/93
F. Procedures to Prevent Hazards	4/26/93
G. Contingency Plan	4/26/93
H. Personnel Training	4/26/93
I. Closure and Post-Closure Requirements	4/26/93
J. Other Federal Laws	4/26/93
K. Part B Certification (Technical Data)	4/26/93
L. Continuing Releases at Permitted Facilities	4/26/93
M. Research Development and Demonstration Permits	4/26/93



<u>Attachments</u>		<u>Agency Reception Date of Approved Version</u>
Figure B-1	Handling Process for Spent Parts Washer Solvent	4/26/93
Figure B-2	Solvent Use and Regeneration Loop	4/26/93
Figure B-2a	Unit Process for Handling Bulk Antifreeze Waste	4/26/93
Figure B-3	Unit Process for Handling Waste Containers	4/26/93
Figure B-4	Topographic Map	4/26/93
Figure B-5	Existing Site Plan	4/26/93
Figure B-5a	Topographic Site Plan	4/26/93
Figure B-6	1967 Zoning Map	4/26/93
Figure B-7	Pekin Municipal Well Locations	4/26/93
Figure B-8	Wind Rose - Peoria, Illinois	4/26/93
Figure B-9	Geological Structural Features of Tazewell County	4/26/93
Figure B-10	Floodplain Map	4/26/93
Figure B-11	Traffic Pattern for Antifreeze Tank	4/26/93
Figure B-12	Traffic Pattern for 4-Pack Tank Farm	4/26/93
Figure B-13	Traffic Pattern for Metal Shelters	4/26/93
Figure B-14	Traffic Pattern for Container Warehouse	4/26/93
Figure B-14a	Traffic Pattern for Return/Fill Shelter	4/26/93
Figure B-14b	Traffic Pattern for Transfer Trailer	4/26/93
Figure B-15	Topographic Details Within 1000 Feet	4/26/93
Exhibit B-1	FRS Wastes	4/26/93
Exhibit B-2	Blank Operating Log	4/26/93
Exhibit B-3	Completed Operating Log	4/26/93
Exhibit B-4	Well Logs for Surrounding Wells	4/26/93
Exhibit B-5	Permit to Use V.F.W. Road	4/26/93
Table B-1	Summary of Municipal Wells in Pekin, Illinois	4/26/93
Exhibit C-1	Analyses MSDS, and Product Specifications for Spent Parts, Washer Solvent Waste, and Analyses of Parts Washer Solvent Dumpster Sediment	4/26/93
Exhibit C-2	Analyses and MSDS for Spent Immersion Cleaner	4/26/93
Exhibit C-3	Analyses, MSDS, and Product Specifications for Dry Cleaner Wastes	4/26/93
Exhibit C-4	Analyses and MSDS for Paint Wastes	4/26/93
Exhibit C-5	LDR Notification Form	4/26/93
Exhibit C-6	Analyses and MSDS for Spent Antifreeze	4/26/93
Exhibit C-6a	Waste Antifreeze TCLP Data	4/26/93
Exhibit C-7	Quality Control Procedures	4/26/93
Exhibit C-8	Waste Acceptance Criteria	4/26/93

<u>Attachments</u>		<u>Agency Reception Date of Approved Version</u>
Table C-1	Parameters and Rationale for Hazardous Waste Analyses	4/26/93
Table C-2	Parameters and Test Methods	4/26/93
Table C-3	Methods Used to Sample Hazardous Wastes	4/26/93
Table C-4	Frequency of Analysis	4/26/93
Table C-5	Examples of Potentially Incompatible Wastes	4/26/93
Figure D-1	Example of Typical Coms Pump	4/26/93
Figure D-2	Typical Container Label	4/26/93
Figure D-3	Drum Washer Schematic and Details	4/26/93
Figure D-4	Example Warehouse Pallet Layout	4/26/93
Figure D-5	Example Flammable Storage Shelter Pallet and Drum Layout	4/26/93
Figure D-6	Warehouse Plan and Details	4/26/93
Figure D-7	Flammable Storage Shelter	4/26/93
Figure D-8	4-Pack Tank Farm and Return/Fill Piping Plan	4/26/93
Figure D-9	Used Parts Washer Solvent 20,000 Gallon Vertical Storage Tank	4/26/93
Figure D-10	Environmental Piping Schematic for Used Parts Washer Solvent	4/26/93
Figure D-11	Used Antifreeze 10,000 Gallon Horizontal Storage Tank	4/26/93
Figure D-12	Environmental Piping Schematic for Used Antifreeze	4/26/93
Figure D-13	Horizontal Tank Piping Plan	4/26/93
Figure D-14	Used Antifreeze Horizontal Tank Concrete Plan & Details	4/26/93
Figure D-15	Used Parts Washer Solvent Dumpster	4/26/93
Figure D-16	Return/Fill Shelter	4/26/93
Figure D-17	Tank Farm Tank Access Container	4/26/93
Figure D-18	Used Antifreeze Tank Access Container	4/26/93
Figure D-19	4-Pack Tank Farm Plan & Details	4/26/93
Figure D-20	Moorman Bros. Tank Gauge Details	4/26/93
Figure D-21	Used Parts Washer Solvent High Level Alarm System Diagram	4/26/93
Figure D-22	Horizontal Tank Level Gauge	4/26/93
Figure D-23	Used Antifreeze High Level Alarm System Diagram	4/26/93
Exhibit D-1	Specifications for Rust Inhibiting Drum Coating	4/26/93
Exhibit D-2	Polyethylene Drum Fluorination	4/26/93
Exhibit D-3	Example Epoxy Coating Technical Data	4/26/93
Exhibit D-4	Example of Typical Wet/Dry Vacuum Cleaner Specifications	4/26/93
Exhibit D-5	Engineering Assessment of Tank Farm	4/26/93
Exhibit D-5a	Tank Construction Materials	4/26/93

<u>Attachments</u>	<u>Agency Reception Date of Approved Version</u>
Exhibit D-6 Engineering Assessment of Parts Washer Solvent Dumpster	4/26/93
Exhibit D-7 Engineering Assessment of the Container Storage Areas	4/26/93
Exhibit D-7a Container Storage Area Assessment, September 1992	4/26/93
Exhibit D-8 Design Engineering Assessment of Used Antifreeze Tank System	4/26/93
Exhibit D-8a Installation Assessment of Used Antifreeze Tank System	4/26/93
Exhibit D-9 Secondary Containment Photographs	4/26/93
Exhibit D-10 Waste Streams and Containers Specifications	4/26/93
Exhibit D-11 Safety-Kleen Corporation Specifications for Storage Containers	4/26/93
Exhibit D-12 Typical Epoxy Sealant Specifications	4/26/93
Exhibit D-13 Secondary Containment Calculations	4/26/93
Exhibit D-14 Typical Drum Pallet Configurations	4/26/93
Exhibit D-15 Container Storage Area Secondary Containment Photos, February 1993	4/26/93
Figure F-1 Emergency Equipment Plan	4/26/93
Figure F-2 Tank and Container Setback Plan	4/26/93
Exhibit F-1 Inspection Log for Drum Storage Areas - Example	4/26/93
Exhibit F-2 Inspection Log for Storage Tank System - Example	4/26/93
Exhibit F-3 Inspection Log for Safety and Emergency Equipment	4/26/93
Exhibit F-4 Inspection Lists and Diagrams for Pumps, Valves and Flanges	4/26/93
Exhibit F-5 Determination of Water Supply	4/26/93
Exhibit F-6 Fire Protection Adequacy, November 1992	4/26/93
Table F-1 Emergency Equipment List	4/26/93
Table F-2 Facility Inspection Frequency	4/26/93
Attachment G-1 Most Recent Coordination Letters	4/26/93
Figure G-1 Existing Site Plan	4/26/93
Figure G-2 Emergency Equipment Plan	4/26/93
Figure G-3 Safety-Kleen Corporation Field Spill Report Form	4/26/93
Figure G-4 Emergency Evacuation Routes	4/26/93

<u>Attachments</u>		<u>Agency Reception Date of Approved Version</u>
Exhibit G-1	Pekin Service Center Emergency Information	4/26/93
Exhibit G-2	Material Safety Data Sheets	4/26/93
Exhibit G-3	Remedial Contractor Qualifications	4/26/93
Exhibit G-4	Exposure Modeling Scenarios	4/26/93
Exhibit G-5	Archie Model Input Parameters (Downwind Air Dispersion Modeling)	4/26/93
Table G-1	Employee Functions During an Emergency	4/26/93
Table G-2	Emergency Equipment List	4/26/93
Table G-3	Hazardous Waste Physical Characteristics	4/26/93
Table G-4	Emergency Response Criteria - Indoor Release	4/26/93
Table G-5	Emergency Response Criteria - Indoor Fire	4/26/93
Exhibit H-1	Employee Titles and Job Descriptions	4/26/93
Exhibit H-2	Trainer Resumes	4/26/93
Exhibit H-3	Example Training Record	4/26/93
Exhibit H-4	Level of Training for Hazardous Waste Personnel	4/26/93
Exhibit H-5	Contingency Plan Training for Alternate Emergency Coordinators	4/26/93
Exhibit H-6a	Standard Operating Procedures for Coliwas Sampling for Waste Drums	4/26/93
Exhibit H-6b	Standard Operating Procedures for the Determination of Specific Gravity	4/26/93
Table H-1	Branch Manager Training Outline	4/26/93
Table H-2	Introductory and Annual Training Topics for Facility Employees	4/26/93
Table H-2a	New Employee Orientation/Training Outline	4/26/93
Table H-3	Example Periodic Training Topics	4/26/93
Table H-4	Example Emergency Response Training Topics	4/26/93
Exhibit I-1	Soil Sampling Plan Outline	4/26/93
Exhibit I-2	Closure Schedule	4/26/93
Exhibit I-3	Notice in Deed of Hazardous Waste Activity on Property	4/26/93
Exhibit I-4	Pekin, Illinois Facility Closure Cost Estimate	4/26/93
Exhibit I-5	Financial Assurance Mechanism for Closure	4/26/93
Exhibit I-6	Hazardous Waste Facility Certificate of Liability Insurance	4/26/93
Exhibit J-1	Illinois Environmental Protection Agency Permit to Operate Emission Source	4/26/93

<u>Attachments</u>		<u>Agency Reception Date of Approved Version</u>
Exhibit K-1	Certification Statement - Pekin, Illinois Service Center	4/26/93
Exhibit K-2	Prior Conduct Certification Statement - Pekin, Illinois Service Center	4/26/93
Figure L-1	FRS Transfer Shelter	4/26/93
Exhibit L-1	Release History	4/26/93
Exhibit L-2	Example Used Oil Certification	4/26/93
Exhibit L-3	Example Prequalification Evaluation Customer Survey	4/26/93
Exhibit L-4	FRS Transfer Shelter Specifications	4/26/93

ATTACHMENT G

FINANCIAL ASSURANCE REQUIREMENTS

ILD093862811

	<u>Amount of Waste Allowed</u>	<u>Financial Assurance Required For Unit</u>
Existing Tankage	28,500 gallons	\$57,042
Existing Container Storage Volume	<u>6,912 gallons</u>	<u>\$46,490</u>
	35,412 gallons	\$103,532

RH:sf/sp/794Y

B-96

cc: Peoid

~~Raymond~~

USEPA

DWC  
RAH

Harding Lawson Associates



July 17, 1992

Mr. Ron Harmon  
Permit Section  
Division of Land Pollution Control  
Illinois Environmental Protection Agency  
2200 Churchill Road  
Springfield, Illinois 62794-9276

RE: 1790600011 - Tazwell County  
Safety-Kleen - Pekin  
ILD093862811

Dear Mr. Harmon,

On the behalf of Safety-Kleen, Harding Lawson Associates (HLA) is submitting the information requested in your recent phone conversation with Mr. Alan Raymond, Safety-Kleen Regional Environmental Engineer. This information supplements the May 30 submittal to the Agency in response to the April 17, 1992 Notice of Deficiency (NOD) for the RCRA Part B permit application for the above referenced facility.

The items enclosed include the original Part A application dated in July of 1991 and four sets of color copies of the photographs attached to the Part A application. Figures B-5a, B-6a, and B-15 have been revised per your requests, and the original and three copies have been included for your use. Several pages of the permit application were modified to reference specific locations of supporting materials in the appendices, and four copies of these pages have also been included in this submittal. The corrected pages are formatted such that they can be directly incorporated into the current permit application without modifications to the entire document.

If you have any questions regarding this submission, please do not hesitate to contact either of the undersigned or Mr. Alan Raymond, Safety-Kleen Regional Engineer at (413) 441-3947.

Sincerely,

HARDING LAWSON ASSOCIATES

For: Michael L. Smith, P.E.  
Managing Associate Engineer

Susan A. Harris, E.I.T.  
Staff Engineer

RECEIVED

JUL 20 1992

IEPA-DLFC

cc: Alan Raymond - Safety Kleen

11954,041/Safetykl/0716922V.01





Certified Mail - Return Receipt Requested

June 28, 1991

Mr. Todd Gmitro  
RCRA Permitting Branch (5HR-13)  
U.S. EPA Region V  
230 S. Dearborn St.  
Chicago, IL 60604

Subject: Safety-Kleen Corp.  
Pekin, Illinois Service Center  
ILD 093862811  
RCRA Air Emission Standards

Dear Mr. Gmitro,

This letter is in response to Mr. George Hamper's letter of May 29, 1991 which requested the Part B permit information required under 40 CFR 270.24 and 270.25 for the above referenced facility.

Safety-Kleen's Pekin service center does not have process vents to which subpart AA of part 264 applies, so section 270.24 is not applicable.

The following information is required under section 270.25:

270.25(a)

1. Equipment is associated with a 20,000 gallon aboveground vertical tank and two dumpsters in the return/fill station which are considered storage tanks. Both units are used for spent mineral spirits storage. In addition, a 10,000 gallon self-contained aboveground horizontal tank is used for spent antifreeze storage.
2. A site plan identifying the hazardous waste management units at the facility is enclosed. Also enclosed are completed equipment inventory forms listing each piece of regulated equipment.
3. Types of equipment include pumps, flanges and valves.
4. The hazardous waste streams, spent mineral spirits and spent antifreeze, can be considered to contain 100% by weight organics.



Mr. Todd Gmitro  
June 28, 1991  
Page 2

5. The hazardous waste state is liquid.
6. The equipment is considered to be in heavy liquid service since the mineral spirits vapor pressure is 2 mm Hg or 0.27 kPa. Equipment associated with the waste antifreeze tank is also in heavy liquid service. Ethylene glycol has a vapor pressure at 68°F of 0.08 mm Hg or 0.01 kPa. Compliance with the standard (264.1058) will be achieved through daily facility inspections and, if required, leak detection monitoring and repair. A copy of the daily inspection record and leak detection and repair record for equipment is enclosed.

Sections 270.25(b), (c) and (e) are not applicable to Safety-Kleen's Pekin facility.

270.25(d)

Safety-Kleen maintains in the facility operating record the information required under 264.1064. The enclosed forms and plans contain the necessary information.

Please contact me on extension 2550 if you have any questions or require further information.

Sincerely,



Anita H. Pendry  
Environmental Permit Writer

cc: J. Dreith, A.T. Kearney  
J. Simpson  
Branch Manager, 5-136-01  
J. Zimmerman, St. Louis Reg. Mgr.  
K. Schmuggerow

## **EQUIPMENT INVENTORY**

### **PEKIN, ILLINOIS SERVICE CENTER**

**TO BE FILLED OUT AT THE BRANCH AND KEPT IN THE OPERATING RECORD (FILE 1070) WITH THE SITE PLAN AND PUMP, FLANGE AND VALVE LISTS**

Listed on the attached pump, flange and valve lists is all equipment at the facility which is subject to the requirements of 40 CFR 264 and 265, Subpart BB. The equipment is also identified on the attached site plan and equipment schematic drawing.

The hazardous waste influent to and effluent from the hazardous waste management units (20,000 gallon tank and return/fill station dumpsters) is spent mineral spirits (D001, D004-D011, D018, D019, D021-D030 and D032-D043). The tank is used for storage of spent mineral spirits which is usually 100% by weight organic. The vapor pressure of mineral spirits at 68°F is 0.27 kPa (equivalent to 2 mm Hg - see MSDS and the attached EPA guidance document pages). The waste stream has a vapor pressure equal or lower than that of the clean mineral spirits due to contamination during use with oil, grease and sediment and it is in a liquid state at the equipment, so all equipment is in contact with materials defined as heavy liquid under the cited regulations.

Equipment associated with the 10,000 gallon waste antifreeze tank is also in heavy liquid service. Ethylene glycol has a vapor pressure at 68°F of 0.08 mm Hg or 0.01 kPa and is usually 100% organic.

Compliance with the standard (264.1058) is achieved through daily facility inspections, and if required, leak detection monitoring and repair. If a leak is detected, the piece of equipment will be tagged with the equipment I.D. number and the dates which evidence of a potential leak and actual leak were detected (264.1064(c)(1)). The facility inspection record has been updated to include a detailed daily equipment inspection. Records of equipment monitoring and repair are maintained on a separate form in the operating record.

DATE 6/18/91  
BRANCH # 5-136-01  
PREPARER'S  
SIGNATURE Sue Ryan

[illegible]

DATE 6/18/91

BRANCH # 5-136-01

SIGNATURE Sue Ryan

[illegible]

4

1

6/18/91

5-136-01

Suo Ryan

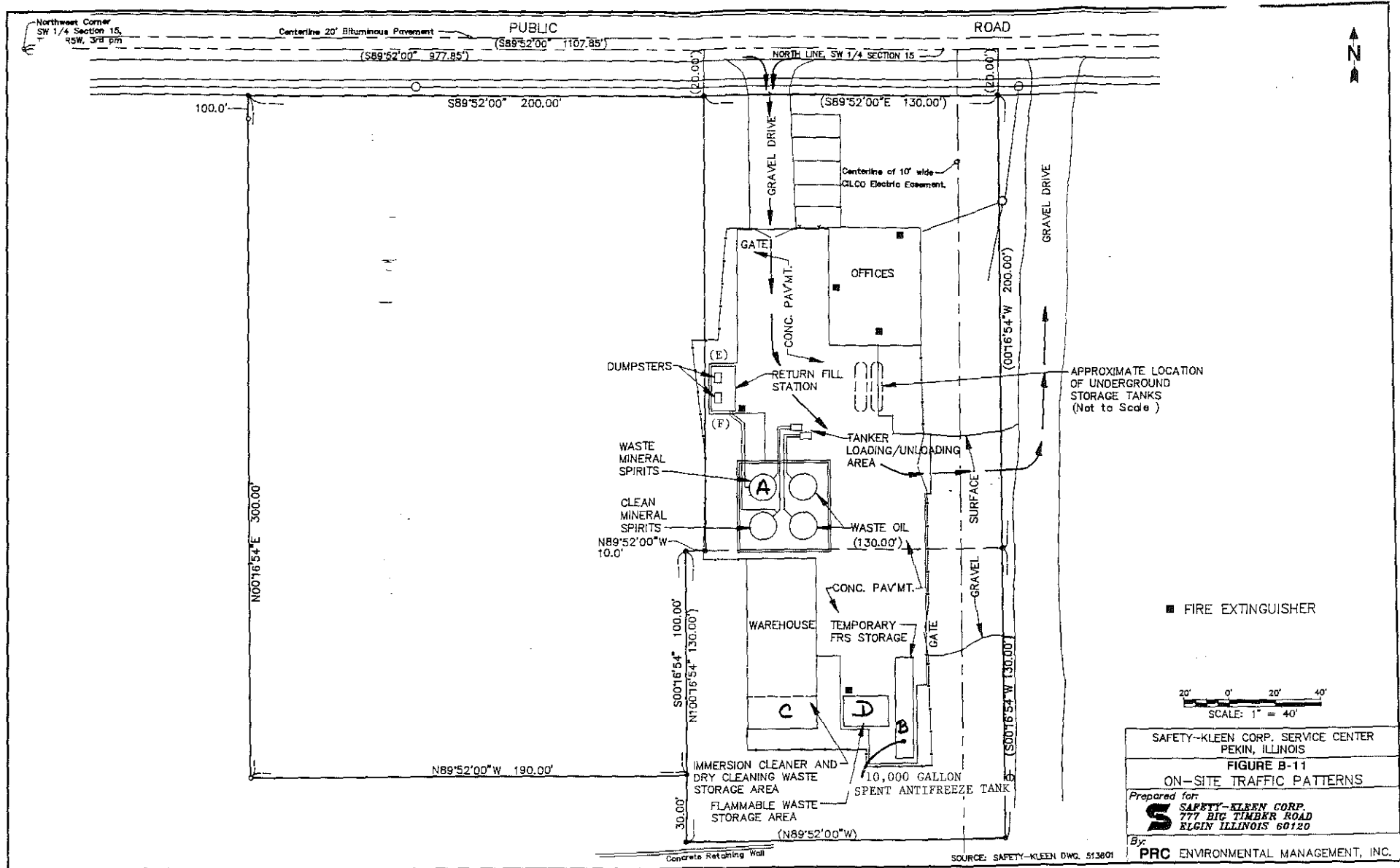
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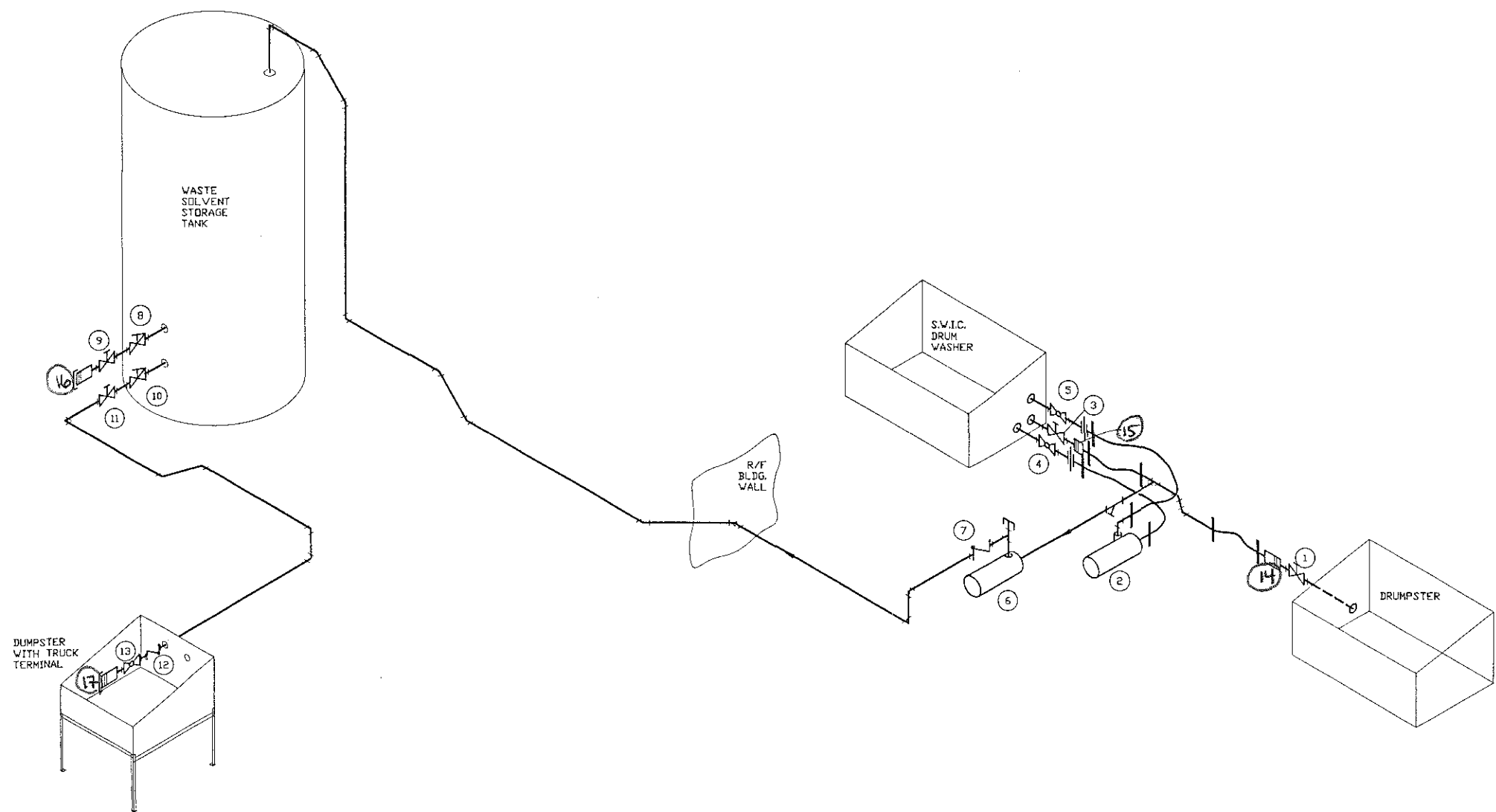


2



EQUIPMENT SCHEDULE	
MARK	DESCRIPTION
①	3" CAM LOCK
②	3" GATE VALVE
③	3" CHECK VALVE
④	3" CAM LOCK
⑤	3" GATE VALVE
⑥	3" CHECK VALVE
⑦	8 OZ. PRESSURE VENT
⑧	
⑨	
⑩	
⑪	
⑫	
⑬	
⑭	
⑮	
⑯	
⑰	
⑱	
⑲	
⑳	
\	

GENERAL NOTES								TITLE ETHYLENE GLYCOL PIPING SCHEMATIC PROPOSED AREO TANK INSTALLATION			
THIS DRAWING CONTAINS INFORMATION PROPRIETARY TO SAFETY-KLEEN CORPORATION. ANY REPRODUCTION, DISCLOSURE OR REUSE OF THIS DRAWING IS EXPRESSLY PROHIBITED EXCEPT BY WRITTEN PERMISSION OF SAFETY-KLEEN OR AS SAFETY-KLEEN MAY AGREE IN WRITING.								 <b>SAFETY-KLEEN CORP.</b> 777 BIG TIMBER ROAD ELGIN, ILLINOIS 60123 PHONE 708-697-8460			
								SCALE 1/4" = 1'-0"			
								BY MBH CHKD - P.E. APPR - OP. APPR - DATE 06/26/91			
								SERVICE CENTER LOCATION SC-DWG NUMBER REV. NO.			
								PEKIN, IL. 513601-E2001 00			
		NO. DESCRIPTION BY CHK APPR DATE REVISIONS									



WASTE SOLVENT PIPING SCHEMATIC

NO SCALE

# GENERAL NOTES

THIS DRAWING CONTAINS INFORMATION PROPRIETARY TO SAFETY-KLEEN CORPORATION. ANY REPRODUCTION, DISCLOSURE OR USE OF THIS DRAWING IS EXPRESSLY PROHIBITED EXCEPT BY SAFETY-KLEEN OR AS SAFETY-KLEEN MAY AGREE IN WRITING.

## FITTING SCHEDULE

1	2" THREADED GATE VALVE
2	WASTE SOLVENT RECIRCULATION PUMP
3	2" THREADED GATE VALVE
4	1 1/2" THREADED BALL VALVE
5	1 1/4" THREADED BALL VALVE
6	WASTE SOLVENT PUMP
7	2" THREADED CHECK VALVE
8	3" THREADED EXTERNAL EMERGENCY VALVE
9	3" THREADED GATE VALVE
10	3" THREADED EXTERNAL EMERGENCY VALVE
11	3" THREADED GATE VALVE
12	3" THREADED CHECK VALVE
13	3" THREADED GATE VALVE

## SYMBOL LIST

	CAMLOC COUPLING
	90° CAMLOC COUPLING
	GATE VALVE
	INTERNAL EMERGENCY VALVE
	BALL VALVE
	SCREWED COUPLING
	CHECK VALVE
	STRAINER
	PUMP
	REDUCER/INCREASER
	SCREWED UNION
	CAP
	HOSE CLAMP
	FLEXIBLE HOSE
	PIPE PENETRATION/ATTACHMENT TO EQUIPMENT
	DIRECTION OF FLOW

## CONNECTION TYPES

	FLANGED
	SCREWED
	WELDED

TITLE		WASTE SOLVENT PIPING SCHEMATIC	
SAFETY-KLEEN CORP.		777 BIG TIMBER ROAD ELGIN, ILLINOIS 60123 PHONE 708-697-8468	
SCALE	BY	CHKD	P.E. APPR
NONE	Q	-	-
DATE	2-1-91	REV. NO.	00
NO. DESCRIPTION		BY	CHK APPR DATE
REVISIONS			
SERVICE CENTER LOCATION		SC-DWG NUMBER	
PEKIN, IL		513601-E2000	

TABLE 6-3. VAPOR PRESSURES OF COMMON SOLVENTS

	VP @ 20°C, kPa (mm Hg)		Most appropriate analytical method
Halogenated Solvents			
Methylene chloride	45.2	(340)	EPA Method 8240
1,1,1-Trichloroethane	2.3	(17)	EPA Method 8240
Trichloroethylene	7.8	(59)	EPA Method 8240
Perchloroethylene	1.7	(13)	EPA Method 8240
Methyl ethyl ketone	9.4	(70.6)	EPA Method 8240
Methyl isobutyl ketone	2.1	(16)	EPA Method 8240
Toluene	5.1	(38)	EPA Method 8240
Acetone	24.6	(185)	EPA Method 8240
Xylene(s)	1.3	(9.5)	EPA Method 8240
Mineral spirits	0.27	(2.0)	ASTM E 260
Alcohols			
Isopropyl alcohol	4.1	(31)	ASTM E 260
Methanol	12.7	(96)	ASTM E 260
Ethanol	5.9	(44)	ASTM E 260

VP = vapor pressure.

INSPECTION LOG SHEET FOR: Daily Inspection List of EQUIPMENT

INSPECTOR'S NAME/TITLE: \_\_\_\_\_

INSPECTOR'S SIGNATURE: \_\_\_\_\_

	MON	TUES	WED	THURS	FRI
--	-----	------	-----	-------	-----

DATE: (M/D/Y) \_\_\_\_\_

TIME: \_\_\_\_\_

Pump, Valve or Flange Number

1	A <sup>*</sup> N	A N	A N	A N	A N
2	A N	A N	A N	A N	A N
3	A N	A N	A N	A N	A N
4	A N	A N	A N	A N	A N
5	A N	A N	A N	A N	A N
6	A N	A N	A N	A N	A N
7	A N	A N	A N	A N	A N
8	A N	A N	A N	A N	A N
9	A N	A N	A N	A N	A N
10	A N	A N	A N	A N	A N
11	A N	A N	A N	A N	A N
12	A N	A N	A N	A N	A N
13	A N	A N	A N	A N	A N
14	A N	A N	A N	A N	A N
15	A N	A N	A N	A N	A N
16	A N	A N	A N	A N	A N
17	A N	A N	A N	A N	A N
18	A N	A N	A N	A N	A N
19	A N	A N	A N	A N	A N
20	A N	A N	A N	A N	A N

If "N", enter pump, valve or flange # \_\_\_\_\_ and circle appropriate problem:  
potential leak, actual leak, sticking, wear, does not operate smoothly, other:

For all leaks and potential leaks, the Leak Detection and Repair Record must  
be completed.

\*  
A = ACCEPTABLE  
N = NOT ACCEPTABLE

Draw a line through I.D. numbers which do not apply.

# LEAK DETECTION AND REPAIR RECORD

EQUIPMENT I.D.# \_\_\_\_\_  
DESCRIPTION \_\_\_\_\_

BRANCH # \_\_\_\_\_

	<u>DATE</u>	<u>INSPECTOR'S SIGNATURE</u>
HOW WAS POTENTIAL OR ACTUAL LEAK DETECTED? _____	_____	_____

DESCRIBE THE POTENTIAL OR ACTUAL LEAK: \_\_\_\_\_  
\_\_\_\_\_

INSTRUMENT MONITORING WITHIN FIVE DAYS

(1.) RESULTS \_\_\_\_\_

REPAIR ATTEMPT  
METHOD \_\_\_\_\_

(2.) RESULTS \_\_\_\_\_

REPAIR ATTEMPT  
METHOD \_\_\_\_\_

(3.) RESULTS \_\_\_\_\_

DATE OF SUCCESSFUL REPAIR  
(must be completed w/in 15 days)

METHOD \_\_\_\_\_  
(4.) RESULTS \_\_\_\_\_

FOLLOWUP MONTHLY MONITORING FOR VALVES

(5.) RESULTS \_\_\_\_\_

(6.) RESULTS \_\_\_\_\_

MONITORING SUMMARY

(REFERENCE NUMBER - SEE ABOVE)

(1) (2) (3) (4) (5) (6)

INSTRUMENT #/OPERATOR  
CALIBRATION  
BACKGROUND READING  
READING AT EQUIPMENT  
LEAK DETECTED?

_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____

ATTACH ANY DOCUMENTATION PREPARED BY THE CONSULTANT

United States  
Environmental Protection  
Agency

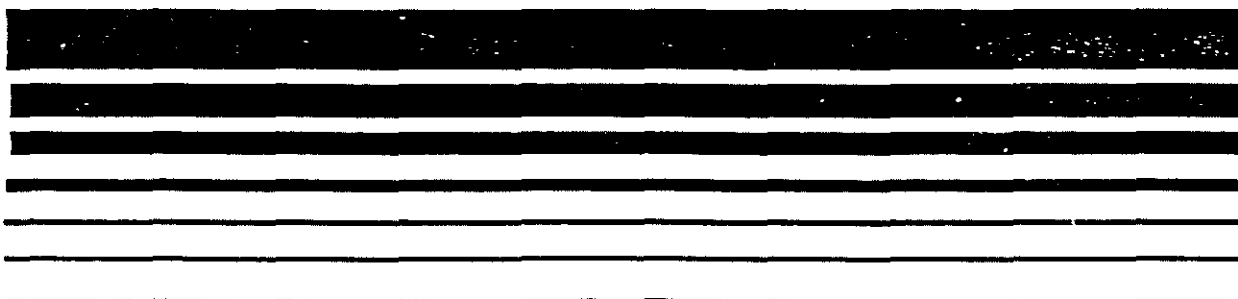
Office of Air Quality  
Planning and Standards  
Research Triangle Park NC 27711

EPA-450/3-89-021  
July 1990

Air



# **Hazardous Waste TSDF - Technical Guidance Document for RCRA Air Emission Standards for Process Vents and Equipment Leaks**



# RCRA

REPRODUCED BY  
U.S. DEPARTMENT OF COMMERCE  
NATIONAL TECHNICAL  
INFORMATION SERVICE  
SPRINGFIELD, VA 22161

# VOC Air-Emissions Calculations

		1,1,1-							
	Methylene	Trichloro	Trichloro	Perchloro	Mineral				
	Chloride	ethane	ethylene	ethylene	Spirits	Acetone	Toluene	Methanol	Ethanol
Atmos. pressure (mm Hg):	760.0	760.0	760.0	760.0	760.0	760.0	760.0	760.0	760.0
Unit weight of air (lbs):	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0
Ambient temperature (oF):	68.0	68.0	68.0	68.0	68.0	68.0	68.0	68.0	68.0
Vapor press. VOC (mm Hg):	311.5	101.9	59.0	12.7	1.28	177.21	21.80	93.74	42.27
Molecular weight of VOC:	84.9	133.4	131.4	165.8	150.0	58.08		32.04	46.07
-----	-----	-----	-----	-----	-----	-----	-----	-----	-----
(1) Partial pressure air =	448.5	658.1	701.0	747.3	758.7	582.8	738.2	666.3	717.7
(2) Mole fraction of air =	0.590	0.866	0.922	0.983	0.998	0.767	0.971	0.877	0.944
(3) Pound-moles of air =	0.034	0.034	0.034	0.034	0.034	0.034	0.034	0.034	0.034
(4) Pound-moles, total =	0.058	0.040	0.037	0.035	0.035	0.045	0.036	0.039	0.037
(5) Pound-moles of VOC =	0.024	0.005	0.003	0.001	0.000	0.010	0.001	0.005	0.002
(6) Pounds of VOC =	2.03	0.71	0.38	0.10	0.01	0.61	0.00	0.16	0.09
(7) VOC CONC. PPM (VOL.) =	409,922	134,050	77,609	16,743	1,688	233,176	28,678	123,347	55,622
(8) VOC CONC. PPM (WGT.) =	670,455	415,916	276,010	88,717	8,668	378,495	0	134,537	85,561



Part B-Log 96

USEPA  
PRC Environmental Management, Inc.  
233 N. Michigan Avenue  
Suite 1621  
Chicago, IL 60601  
312-856-8700  
Fax 312-938-0118

**PRC**

May 1, 1991

Mr. Doug Clay  
Illinois Environmental Protection Agency  
Permit Section, Division of Land Pollution Control  
2200 Churchill Road  
Springfield, IL 62706

Subject: Safety-Kleen Pekin Service Center  
Revised Pages for RCRA Part B Permit Application

Dear Mr. Clay:

At the request of Safety-Kleen Corporation, PRC Environmental Management, Inc. is submitting four copies of revised pages for the RCRA Part B Permit Application for Safety-Kleen's Pekin, Illinois, Service Center. The Part B application for this facility was originally submitted to your agency on December 3, 1990. The revised pages included with this letter describe (1) a 10,000-gallon aboveground tank to be permitted for storage of spent antifreeze and (2) Safety-Kleen's decision to use two metal shelters for transfer wastes, rather than permitted storage. An updated Part A application is also included. Revisions have been made to the following sections of the Part B application:

- A Part A Application
- B Facility Description
- C Waste Characteristics
- D Process Information
- F Procedures to Prevent Hazards
- G Contingency Plan
- I Closure and Post-Closure Requirements
- L Continuing Releases at Permitted Facilities

In addition, material to be inserted within the permit application appendices is enclosed. This material includes Appendix A, Exhibits C-6 and C-7, Tables C-1 through C-4, Figures D-23 through D-25, Exhibit D-4, and Exhibits I-4 and I-5.

If you have any questions on these revisions or require additional information, please call Anita Pendry, Safety-Kleen's permit writer for Illinois facilities at (708) 697-8460 (x2250).

Sincerely,

*John Dirgo*

John Dirgo  
Environmental Scientist

cc: A. Pendry, Safety-Kleen  
E. Jurczak, Safety-Kleen  
R. Peoples, Safety-Kleen  
PRC distribution

RECEIVED

MAY 2 1991

IEPA-DLPC

21

# CONVERSATION RECORD

TIME

1:00 P.M.

DATE

5-29-91

☐ VISIT

☐ CONFERENCE

☒ TELEPHONE

☐ INCOMING

☒ OUTGOING

## ROUTING

NAME/SYMBOL	INT

Location of Visit/Conference:

NAME OF PERSON(S) CONTACTED OR IN CONTACT WITH YOU

Ms. June Dreith

ORGANIZATION (Office, dept., bureau, etc.)

AT KEARNEY

TELEPHONE NO:

303/572-6175

SUBJECT

Work plan - Safety Klean Pekin

## SUMMARY

I called June to find out if Safety Klean's Part B Application contained information showing compliance with Subpart BB (specific Part B requirements for subpart BB are under 40CFR 270.25). The answer to this was no. We decided that AT Kearney would continue with the Part B review for the State, the U.S. EPA would send a letter to Safety Klean requesting subpart BB information for Pekin, and AT Kearney would review that for completeness/technical adequacy once it was received. (Task 03)

She informed me that this would not require modifying the work plan and that she would send a letter regarding the fact that this specific Task would be delayed.

## ACTION REQUIRED

send letter to Safety Klean

NAME OF PERSON DOCUMENTING CONVERSATION

Todd Gmitro

SIGNATURE

Todd Gmitro

DATE

5-29-91

## ACTION TAKEN

Letter sent

SIGNATURE

Todd Gmitro

TITLE

Geologist

DATE

5-29-91

G. Hamper



Illinois Environmental Protection Agency P.O. Box 19276, Springfield, IL 62794-9276

217/782-6762

Refer to: 1790600011--Tazewell County  
Safety Kleen (Pekin)  
ILD093862811  
RCRA Permit  
Log No. B-96

April 15, 1991

Safety Kleen Corporation  
Attn: Ellen Jurczak  
777 Big Timber Road  
Elgin, Illinois 60120

Dear Ms. Jursak:

*was replied  
May 2, 1991*

This letter is a follow-up to recent discussions you have had with members of my staff regarding the RCRA Part B permit application for the above-referenced facility. Specifically, the Illinois Environmental Protection Agency is currently reviewing this application and has retained a contractor through USEPA to aid in this review. Therefore, as discussed, IEPA requests that you send a complete copy of this application to the contractor by April 15, 1991. This application should be sent to Ms. Monica B. Roll of A.T. Kearney (Telephone No. 415/595-4300) at the following address:

Ms. Monica B. Roll  
A.T. Kearney  
One Lagoon Drive, Suite 220  
Redwood City, CA 94065

A copy of the cover letter sent to Ms. Roll must be sent to IEPA for our files; however, a copy of the application which is sent to Ms. Roll need not be sent to IEPA. According to our files, the application currently under review is comprised of the following documents:

1. A one volume document submitted under a December 3, 1990 cover letter from John Dirgo.

(2)



Ms. Ellen Jurczak  
April 15, 1991  
Page 2

Thank you for your cooperation on this matter. The use of a contractor on this project should allow for a final permit decision to be made in a more timely manner. If you have any questions regarding this request, please contact Ron Harmon at 217/782-6762.

Very truly yours,

A handwritten signature in cursive script that reads "Lawrence W. Eastep".

Lawrence W. Eastep, P.E., Manager  
Permit Section  
Division of Land Pollution Control

LWE:JKM/jm/skpekin

cc: Division File  
Administrative Record  
Peoria Region  
Bill Radlinski  
USEPA, Region V--George Hamper ✓  
USEPA, Region V--Bernie Orenstein  
Ron Harmon  
Doug Clay  
Charlie Zeal  
Jim Moore  
Monica Roll



Illinois Environmental Protection Agency

P. O. Box 19276, Springfield, IL 62794-9276

217/782-6762

Refer to: 1790600011 -- Tazewell County  
Safety-Kleen - Pekin  
ILD093862811  
RCRA Permit Log No. 96

January 30, 1991

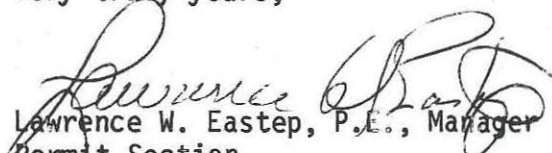
Safety-Kleen Corporation  
777 Big Timber Road  
Elgin, Illinois 60123

Gentlemen:

The Illinois Environmental Protection Agency has reviewed Part B of the RCRA permit application for container storage (S01) and tank storage (S02) dated December 3, 1990 and received December 4, 1990 for the above referenced facility. The Agency has determined that your RCRA Part B permit application is complete. We are now beginning the technical review of the application to assure the facility's conformance to the requirements of 35 Ill. Adm. Code, Subtitle G, Sections 703 and 724.

If you have any questions regarding this subject, please contact Ron Harmon of my staff at 217/782-6762.

Very truly yours,

  
Lawrence W. Eastep, P.E., Manager  
Permit Section  
Division of Land Pollution Control

LWE:DC:sf/303q,31

cc: Division File  
Peoria Region  
USEPA, George Hamper ✓  
Administrative Record  
USEPA, Marilyn Sabadaszka  
Planning and Reporting Section

USEPA

VIA COURIER

December 3, 1990

Mr. Doug Clay  
Illinois Environmental Protection Agency  
2200 South Churchill Road  
Springfield, IL 62706

Subject: Pekin Service Center  
Part B Permit Application

Dear Mr. Clay:

Enclosed please find four (4) copies of the above-referenced permit application. This application was prepared by PRC Environmental Management, Inc., for Safety-Kleen Corporation.

If you have any questions concerning the application, please call me (312/856-8700) or Ms. Ellen Jurczak of Safety-Kleen (708/697-8460).

Sincerely,



John Dirgo  
Environmental Scientist

cc: Ellen Jurczak, Safety-Kleen  
William Miner, PRC

RECEIVED  
DEC 04 1990  
IEPA-DLPC

USEPA



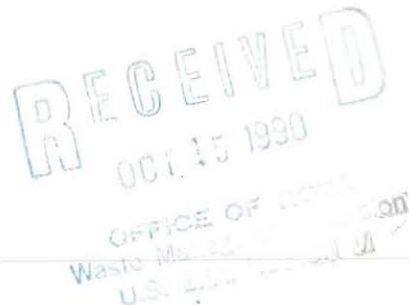
Illinois Environmental Protection Agency

P. O. Box 19276, Springfield, IL 62794-9276

217/782-6762

Refer to: 1790600011 -- Tazewell County  
Safety Kleen - Pekin  
ILD093862811  
RCRA Permit Log No. 96

October 11, 1990



Safety Kleen Corporation  
777 Big Timber Road  
Elgin, Illinois 60123

Gentlemen:

The Agency hereby gives notice of intent to deny a Part B permit to Safety Kleen - Pekin to operate its RCRA hazardous waste management units located in Tazewell County, Illinois. This tentative denial is based on the administrative record contained in the Agency's files. The contents of the administrative record are described in 35 Ill. Adm. Code, Section 705.144.

Under Section 39(d) of the Illinois Environmental Protection Act (Ill. Rev. Stat. 1986, ch. 111 1/2, par. 1039), the Agency is required to provide the applicant with a written statement concurrent with its denial of the permit, explaining the basis for its decision. The reasons for the denial of this permit are contained in Attachment A.

The Agency has been reviewing the application for completeness. Until such time that the application is deemed complete a full technical review is not conducted. Therefore the reasons for denial are the items the Agency found incomplete.

Under the provisions of 35 Ill. Adm. Code 705.141(d), the tentative denial and administrative record must be publicly noticed and made available for public comment. The Agency must also provide an opportunity for a public hearing. The Agency has not scheduled a public hearing at the current time, however, any interested party may request a public hearing. The public comment period will close on December 3, 1990.

During the comment period, the applicant or any interested party may submit comments to the Agency on the letter of intent to deny the application for Safety Kleen's Part B permit, Log #96. At the close of the comment period, the Agency will prepare a response to significant comments.

(15)

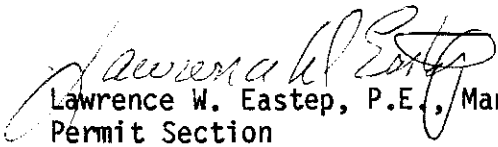


Page 2

The Agency shall issue a final denial decision after the close of the public comment period unless the Agency decides to reverse the tentative decision and continue the review of the application. The applicant has 35 days after the effective date to petition the Board to contest the final denial decision. The appeal process and limitations are addressed in 35 Ill. Adm. Code 705.212. Upon the effective date of Final Permit Denial, the facility must begin closure in accordance with 35 Ill. Adm. Code, Part 725, Subpart G. Denial of the facility's Part B permit does not release Safety Kleen from the responsibility to perform RCRA corrective action at the site.

If you have any questions concerning this letter of intent to deny the Part B permit, please contact Douglas W. Clay, P.E. at 217/782-6762.

Very truly yours,

  
Lawrence W. Eastep, P.E., Manager  
Permit Section  
Division of Land Pollution Control

LWE:MAS:jab/3618n/2,3

cc: Northern Region, w/enclosures  
Division File, w/enclosures  
USEPA, w/enclosures  
William Radlinski, w/enclosures  
Glenn Savage, w/enclosures  
Charlie Zeal, w/enclosures



USEPA



Illinois Environmental Protection Agency • P. O. Box 19276, Springfield, IL 62794-9276

217/782-6762

Refer to: 1790600011 -- Tazewell County  
Safety Kleen - Pekin  
ILD093862811  
RCRA Permit Log No. 96

June 8, 1990

Safety Kleen Corporation  
ATTN: Mr. Rob Omiecinski  
777 Big Timber Road  
Elgin, Illinois 60123

Dear Mr. Omiecinski:

The Illinois Environmental Protection Agency has reviewed Part B of the RCRA permit application for container (S01) and tank (S02) storage areas dated April 10, 1990 and received April 11, 1990 for the above-referenced facility. A list of the deficiencies identified during this third completeness review is included in the attached Notice of Deficiency (NOD).

Each of the deficiencies must be addressed before this Agency can begin the technical review of your permit application. Failure to provide financial assurance in accordance with the requirements of 35 IAC Parts 703 and 724 with the resubmittal may result in denial of the application for permit. Your response must be submitted in quadruplicate and postmarked no later than July 10, 1990. Your revised Part B application shall be developed in accordance with the "RCRA Part B Permit Application Decision Guide" which is enclosed. Failure to use this format will compel the Agency to deny the application. To allow for a proper review of this new information, the location of the response to each deficiency should be identified in a list cross-referencing these items. Each revised page or drawing must have the revision date identified on them for tracking purposes.

A certification identical to that outlined in 35 Ill. Adm. Code 702.126 must accompany your submission. The original and three copies of the revised Part B application and certification, following the format referenced above, should be submitted to the following address:

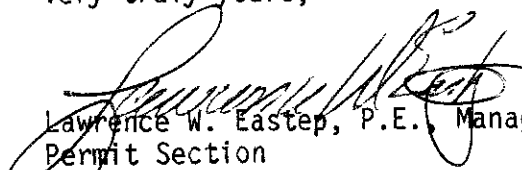
Illinois Environmental Protection Agency  
Division of Land Pollution Control -- #24  
Permit Section  
2200 Churchill Road  
Post Office Box 19276  
Springfield, Illinois 62794-9276



Page 2

If you have any questions, please feel free to contact Douglas W. Clay of my staff at 217/782-6762.

Very truly yours,

  
Lawrence W. Eastep, P.E., Manager  
Permit Section  
Division of Land Pollution Control

LWE:DWC:dls/1815n/94-95

Enclosure

cc: Division File, w/enclosure  
Peoria Region, w/enclosure  
George Hamper, USEPA Region V, w/enclosure  
Compliance Unit  
Doug Clay  
Administration Record  
Marilyn Sabadaszka, USEPA Region V



Safety Kleen - Pekin  
ILD093862811  
June 8, 1990

State I.D. 1790600011  
Log No. 96

Illinois Environmental Protection Agency  
RCRA PART B PERMIT APPLICATION DECISION GUIDE

Subject Requirement: 35 Illinois Administrative Code Section Nos.

A. Part A Application: 702.123, 702.126(a) and (d), 703.181

The application is not complete and/or consistent with the Part B application for the following reasons:

- 1) The map that shows the location of potable water wells is labeled Cincinnati. It appears to be the right map, but the Cincinnati label is confusing.
- 2) No legend was included in the potable water well location map.
- 3) The photographs referenced in your April 10, 1990 submittal have not been received.

B. FACILITY DESCRIPTION

B-2a General Map Requirements: 703.183(s)

- 1) The flood plain map which was to be forwarded to the Agency by May 7, 1990 has not been received.
- 2) The zoning map which was to be forwarded to the Agency by May 7, 1990 has not been received.

C. WASTE CHARACTERISTICS

C-3 Quality Assurance: 702.145

The Quality Assurance Plan submitted is for the Elk Grove facility. A Quality Assurance Plan must be submitted for this site.

D. PROCESS INFORMATION

D-1a(2) Container Management Practices: 724.273

You have failed to specify the number of 5 gallon pails that are equivalent to 432 16-gallon drums for the maximum amount of waste to be stored in the paint shelter.



Page 2

Safety Kleen - Pekin  
ILD093862811  
June 8, 1990

State I.D. 1790600011  
Log No. 96

D-1a(3)(a) Requirement for the Base or Liner to Contain Liquids:  
724.275(a)(1)

You have stated that the paint shelter will not be used once the proposed class IB warehouse is operational. When will this occur? What about in the interim?

D-2f(1)(d) Secondary Containment and Leak Detection Requirements for Ancillary Equipment: 703.202(g), 724.293(f)

Document how it will be ensured that spilled or leaked wastes and precipitation will be removed from the secondary containment system within twenty four (24) hours. If wastes and precipitation cannot be removed within 24 hours, then specify the earliest practical time that removal can take place. Indicate why this longer period does not pose a threat to human health and the environment.

F-4C Water Samples: 703.183(h)(3)

You failed to include your response to comment for this part in the Part B narrative. This information must be included in the Part B narrative for this section to be complete.

F-4e Personal Protection Equipment: 703.183(h)(5)

You failed to describe what personal equipment is used in daily activities. You need to differentiate between emergency equipment and daily equipment.

G. CONTINGENCY PLAN: 703.183(g), 724.150 through 724.156, 724.152(b)

G-1 General Information

You have failed to provide the name of the operator and a site plan as part of the Contingency Plan.

I-1d Inventory Removal, Disposal or Decontamination of Equipment, Structures and Soils: 724.212(b)(4), 724.214

You have failed to provide a detailed closure plan for your tank system.

- 1) Closure of the unit as a landfill; and
- 2) Post-closure care and monitoring for the unit as a landfill.

This additional closure plan must include the following information:



Safety Kleen - Pekin  
ILD093862811  
June 8, 1990

State I.D. 1790600011  
Log No. 96

I-1e Closure of Disposal Units: 703.183(m), 703.203(f), 703.204(h),  
703.207(e), 724.328(a)(2), 724.328(c)(1)(A), 724.358(c), 724.410(a)

Closure plans for all piles, landfills, tank systems and surface impoundments in which wastes or contaminated materials are to remain at closure must describe how the unit will be closed, including a description of the final cover to be established and its expected performance. Contingent closure plans for tanks systems, surface impoundments and waste piles also must provide these descriptions.

I-1e(2) Cover Design: 724.328(a)(2)(C), 724.410(a)

The cover design and installation procedures should be thoroughly described. This submission should include:

- . Drawings showing cover layers, thicknesses, slopes and overall dimensions;
- . The common name, species and variety of the proposed cover crop;
- . Descriptions of synthetic liners to be used, including chemical properties, strength, thickness and manufacturer's specifications;
- . Description of rationale for cover selection;
- . Descriptions of and specifications for protective materials placed above and below synthetic liners;
- . Clay liner characteristics, including thickness and hydraulic conductivity; and
- . Clay liner construction plans, including lift sequencing.

I-1e(3) Minimization of Liquid Migration: 724.328(a)(2)(C)(i), 724.410(a)

For cover designs different than EPA-recommended designs (refer to Permit Applicant's Guidance Manual), provide engineering calculations showing that the proposed cover will provide long-term minimization of liquid migration through the cover.

I-1e(4) Maintenance Needs: 724.328(a)(2)(C)(ii), 724.410(a)

Demonstrate that the cover system will function effectively with minimum maintenance needs.



Safety Kleen - Pekin  
ILD093862811  
June 8, 1990

State I.D. 1790600011  
Log No. 96

I-1e(5) Drainage and Erosion: 724.328(a)(2)(C)(iii), 724.410(a)

Provide the following information:

- . Data demonstrating that the proposed final slopes will not cause significant cover erosion;
- . Descriptions of drainage materials and their hydraulic conductivities;
- . Engineering calculations demonstrating free drainage of precipitation off of and out of the cover; and
- . Estimation of the potential for drainage-layer clogging.

I-1e(6) Settlement and Subsidence: 724.328(a)(2)(C)(iv), 724.410(a)

Describe potential cover settlement and subsidence, considering immediate settlement, primary consolidation, secondary consolidation, and creep and liquefaction. Include the following information:

- . Potential foundation compression;
- . Potential soil liner compression; and
- . Potential waste consolidation and compression resulting from waste dewatering, biological oxidation and chemical conversion of solids to liquids.

Describe the effects of potential subsidence/settlement on the ability of the final cover to minimize infiltration.

I-1e(7) Cover Permeability: 724.328(a)(2)(C)(v), 724.410(a)

Demonstrate that the cover system will have a permeability less than or equal to that of the liner system.

I-1e(8) Freeze/Thaw Effects: 724.328(a)(2)(C), 724.410(a)

Identify the average depth of frost penetration and describe the potential effects of freeze/thaw cycles on the cover.

I-1g Extensions of Closure Time: 724.213

Submit a petition for a schedule for closure which exceeds the 90 days for treatment, removal or disposal of wastes and/or the 180 days for completion of closure activities which justifies that a longer period of closure time is required.



Page 5

Safety Kleen - Pekin  
ILD093862811  
June 8, 1990

State I.D. 1790600011  
Log No. 96

I-5e Financial Test and Corporate Guarantee for Closure: 724.243(f),  
724.251(f), 40 CFR 264.151(h)

An update must be submitted to this Agency in accordance with 724.243(f).

K-2 Engineering Certification: 703.182, Illinois Professional Engineering Act

Technical data, such as design drawings, specifications and engineering studies, must be certified (sealed) by a Professional Engineer who is licensed to practice in the State of Illinois in accordance with Ill. Rev. Stat., par. 5101, Sec. 1 and par. 5119, Sec. 13.1. This information has not yet been received.

DWC:dls/1815n/96-100





Illinois Environmental Protection Agency • P. O. Box 19276, Springfield, IL 62794-9276

217/782-6762

Refer to: 1790609009 -- Tazewell  
Safety Kleen -- Pekin  
ILD093862811  
RCRA Permit Log No. 96

December 21, 1988

Safety Kleen Corporation  
Attn: Donald W. Burkenham, President  
777 Big Timber Road  
Elgin, Illinois 60120

Dear Mr. Burkenham:

The Illinois Environmental Protection Agency has reviewed Part B of the RCRA permit application for container (S01) and tank (S02) storage areas dated November 3, 1988 and received November 9, 1988 for the above-referenced facility. A list of the deficiencies identified during this second completeness review is included in the attached Notice of Deficiency (NOD).

Each of the deficiencies must be addressed before this Agency can begin the technical review of your permit application. Your response must be submitted in quadruplicate and postmarked no later than April 1, 1990. Your revised Part B application should be developed in accordance to the "RCRA Part B Permit Application Decision Guide" enclosed. Failure to use this format will compel the Agency to reject the application as incomplete. Each revised page or drawing must have the revision date identified on them for tracking purposes.

A certification identical to that outlined in 35 Ill. Adm. Code 702.126 must accompany your submission. The original and three copies of the new information and certification should be submitted to the following address:

Illinois Environmental Protection Agency  
Division of Land Pollution Control -- #24  
Permit Section  
2200 Churchill Road  
Post Office Box 19276  
Springfield, Illinois 62794-9276

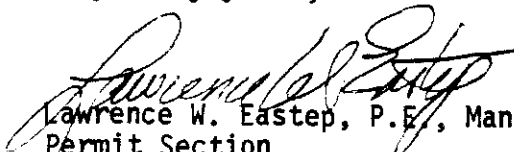




Page 2

If you have any questions regarding this subject, feel free to contact Marla Laymon of my staff at 217/782-6762.

Very truly yours,

  
Lawrence W. Eastep, P.E., Manager  
Permit Section  
Division of Land Pollution Control

LWE:ML/mls/3851j/93-94

Enclosure

cc: Division File, w/enclosure  
Peoria Sub- Region, w/enclosure  
George Hamper, USEPA Region V, w/enclosure ✓  
Mary Murphy, USEPA Region V  
Compliance Section

Safety Kleen - Pekin  
ILD093862811  
December 21, 1988

State I.D. 1790609009  
Log No. 76

Illinois Environmental Protection Agency

RCRA PART B PERMIT APPLICATION DECISION GUIDE

Subject Requirement: 35 Illinois Administrative Code Section Nos.

A. Part A Application: 702.123, 702.126(a) and (d), 703.181 the application is not complete for the following reasons:

1. You failed to provide a topographic map that is adequate for Section 702.123q.

The map provided back in February 19, 1988 is of poor quality and illegible. It is impossible to distinguish between the different contours, surface configuration and structures. To meet the requirements of this Section you must provide a complete topographic map (not a reduction) with the accurate latitudes and longitudes to the nearest whole second. It must also have the map scale and meridian arrow showing north. Cutting and taping a map scale to a reduced copy of a section of a topographic map and drawing the meridian arrow is also inadequate. Section 702.123 requires a topographic map extending to at least one mile beyond the property boundaries of the facility which clearly shows the following:

The legal boundaries of the facility; the location and serial number of each of your existing and proposed intake and discharge structure; all hazardous waste management facilities; each well where you inject fluids underground; and all springs and surface water bodies in the area plus all drinking water wells within 1/4 mile of the facility and identify what public record you received the information.

If an intake or discharge structure, hazardous waste disposal site, both current and proposed, or injection well located more than 1 mile from the plant, include it in the map. If not, attach additional sheets describing the location of the structure, disposal site, or well, and identify the US Geological Survey (or other) map corresponding to the location. ON all maps of the rivers, show the direction of the current, and in tidal waters, show the direction of ebb and flow tides. Use a 7 1/2 minute series map published by the US Geological Survey, which may be obtained through the US Geological Survey Office. If a 7 1/2 minute series map has not been published for your facility site, then you may use a 15 minute series.

2. For your existing facility site plan, the following information is either missing or unclear:
  - a. You must clearly indicate the property boundaries on the plan and provide the approximate dimensions.
  - b. You must provide the dimension of each storage and treatment unit on-site.
  - c. You must provide the map scale and date of publication.
  - d. You did not show the location of the return and fill station and any past storage areas.
3. In your November 3, 1988 response to our NOD, you stated that the facility will provide the photographs at a later time. To date, you have failed to provide the photographs of existing and past units as requested in the March 23, 1988 NOD from the Agency.

B. FACILITY DESCRIPTION

B-2 Topographic Map: 703.183(S), 703.185(C), 703.185(D), 724.195, 724.197

B-2a General Map Requirements: 703.183(S)

1. The 1" = 200 ft. topographic map does not have the date of publication or the meridian arrow showing north.
2. On your site plan, you must indicate and label every solid waste management unit on-site. The March 23, 1988 NOD requested that you provide the location of all solid waste management units on-site.
3. The flood plan map provided on February 19, 1988 is of poor quality and illegible. In your November 3, 1988 response to our March 23, 1988 NOD, you stated that a Flood Insurance map would be sent, but to date the Agency has not received said map.
4. The zoning map provided on February 19, 1988 is of poor quality and illegible. The map also has no date, scale and publisher. You did not respond to this requirement as requested in our March 23, 1988 NOD letter.
5. The reduced revised site plan still does not show the location of the underground tank. The March 23, 1988 NOD requested a map that would show the location of all hazardous waste units on-site.
6. The topographic map or maps did not show the locations of all withdrawal wells around the site as requested in the March 23, 1988 NOD.

B-4 Traffic Information: 703.183(j)

You failed to provide the following traffic-related information as requested in the March 23, 1988 NOD:

You must describe the procedure used to control traffic while it is on-site. This must include where and how the trucks report in, how they are routed to their unloading/loading areas, where they must stop to be weighed in, where they go to have their load sampled, where they check out etc. Please prepare your response to the above in a chronological order from the point the truck arrives at the gate until it leaves the site.

C. WASTE CHARACTERISTICS

C-3 Quality Assurance: 702.145

In your November 3, 1988 response to our March 23, 1988 NOD letter, you stated that the facility would submit a Quality Assurance plan at a later date. To date, you have failed to provide the quality assurance plan, in accordance with the standards established in the Third Edition of SW-846, for laboratory analysis of wastes and groundwater.

D. PROCESS INFORMATION

D-1a(1) Description of Containers: 724.271, 724.272

You failed to provide the following information about the containers used to treat or store hazardous waste:

1. You failed to provide the maximum number of 5 gallon pails and 16 gallon drums allowed in the paint shed as required in the March 23, 1988 NOD.
2. You failed to provide the construction material, dimensions and diagram for the 30 gallon drum as required in the March 23, 1988 NOD.
3. You failed to provide the dimensions, diagram and DOT specifications for the 16 gallon polyethylene drum as required in the March 23, 1988 NOD.
4. You failed to provided the construction material, dimensions, diagram, usable volume and DOT specifications for the 5 gallon pail as required in the March 23, 1988 NOD.
5. You failed to provide the usable volume and DOT specifications for the fiber boxes as required in the March 23, 1988 NOD.

Please provide a narrative about each kind of container used on-site and include the answers to the above questions in that narrative.

D-1a(2) Container Management Practices: 724.273

1. You failed to describe the container management practices used to handle your own processed waste and where on the site it will be stored. This information must be provided as required in the March 23, 1988 NOD.
2. You failed to indicate the aisle space maintained between a row of containers and a wall at both storage locations as required in the March 23, 1988 NOD.
3. You failed to provide the maximum stacking height of the boxes and whether or not they are stored on pallets as required in the March 23, 1988 NOD.

D-1(a)(3)(a) Requirement for the Base of Liner to Contain Liquids:

1. You failed to demonstrate that the base or liner over the base is impervious to your waste and any precipitation (this included precipitation mixed with waste). The above must be discussed for both storage areas on-site.
2. You failed to provide a statement that the base at the paint shed is free of cracks or gaps as required in the March 23, 1988 NOD.
3. You failed to provide an engineering evaluation of the base's structural integrity for both storage areas on-site as required in the March 23, 1988 NOD.
4. You failed to discuss the compatibility of both bases with each kind of waste stored on site as required in the March 23, 1988 NOD.
5. You failed to provide the concrete sections and detail designs for the storage area building base and all of the steel sections and detail design for the paint shed base as required in the March 23, 1988 NOD.

D-1a(3)(b) Containment System Drainage: 703.201(a)(2), 724.275(b)(2)

You failed to provide in your narrative or show in your diagram how the base of your paint shed must be sloped or the containment system must be otherwise designed and operated to drain and remove liquids resulting from leaks, spills, or precipitation, unless the containers are elevated or are otherwise protected from contact with accumulated liquids as required in the March 23, 1988 NOD.

D-1a(3)(c) Containment System Capacity: 703.201(a)(3), 724.275(b)(3)

You failed to provide calculations which demonstrate that the containment system for each container storage area will have sufficient capacity to contain at least 10 percent of the volume of the containers or the volume of the largest container as required in the March 23, 1988 NOD. Just stating that it is without providing the calculations is inadequate. This demonstration must discuss the volume of the largest container, total volume of containers, containment structure capacity, and volume displaced by containers and other structures in the containment system.

D-1b CONTAINERS WITHOUT FREE LIQUIDS

D-1b(1) Test for Free Liquids: 703.201(b)(1), 729.320

Submit the test results or other documentation or information to show that the wastes to be stored do not contain free liquids (e.g. EPA Method No. 9095).

D-1b(2) Description of Containers: 724.271, 724.272

Provide the following information about the containers used to treat or store hazardous waste: approximate number of each type of container, construction materials, dimensions and usable volumes, DOT specifications or other manufacturer specifications, liner specifications (if applicable), container condition (new, used, reconditioned), and markings and labels.

D-1b(3) Container Management Practices: 724.273

Describe container management practices used to ensure that hazardous waste containers are always kept closed during storage except when adding or removing waste, and are not opened, handled, or stored in a manner that may cause the container to rupture or to leak. Include a discussion of procedures for transporting containers across the facility. Indicate the aisle space maintained between rows of containers and provide the maximum number, volume and stacking height of containers for each area in which containers are stored. Provide a plan view of the container storage area(s) which show(s) the arrangement of the containers.

D-1b(4) Container Storage Area Drainage: 703.201(b)(2), 724.275(c)

Describe how the storage area is designed or operated to drain and remove liquids unless containers are otherwise kept from contact with standing liquids.

D-2 Tank Systems

The following items must be provided for all tank systems. Note that a tank system includes the tank and its associated ancillary equipment and containment system.

D-2a Existing Tank Systems

D-2a(1) Assessment of Existing Tank System's Integrity: 703.202(a), 724.292

In your November 3, 1988 response to our March 23, 1988 NOD letter, you stated that the facility would submit the engineer assessment at a later date. To date, you have failed to provide the written assessment that is reviewed and certified by an independent, qualified, registered professional engineer, on the structural integrity and suitability of each tank system for handling hazardous waste as required. This assessment must consider the following: (1) design standard(s), if available according to which the tank and ancillary equipment were constructed; (2) hazardous characteristics of the wastes that have been and will be handled; (3) documented age of the tank system, if available (otherwise, an estimate of the age); and (4) results of a leak test, internal inspection, or other tank integrity examination.

D-2f(1)(b) Requirements for Secondary Containment and Leak Detection:  
724.293(b)-(c), 703.202(g)

You failed to provide the information required in the March 23, 1988 NOD to demonstrate that the secondary containment system will be designed, installed and operated to prevent any migration of waste or accumulated liquid from the tank system to the soil, groundwater, or surface water at any time during its use when the system is upgraded in 1991. You must demonstrate that the secondary containment system can detect and collect releases and accumulated liquids. This demonstration must include the following:

- A. Specify the materials of construction used to construct or line the system. Show that these materials are compatible with the wastes in the tank system.
- B. Demonstrate that the system has sufficient strength and thickness to prevent failure caused by any of the following:
  - pressure gradients (including static head and external hydrological forces);
  - physical contact with the wastes;
  - climatic conditions; and
  - stresses from daily operation (including stresses from nearby vehicular traffic).

- C. Present calculations to prove that the secondary containment system is placed on a foundation or base that is capable of providing support, resisting pressure gradients above and below the system, and preventing failure due to settlement, compression, or uplift.
- D. Provide a description of the leak detection system, including its operating principle, design features and operating procedures. Demonstrate that the leak detection system will detect the failure of either the primary or secondary containment structure or the presence of any release of hazardous waste or accumulated liquid in the secondary containment system within twenty four (24) hours. If the prevailing site conditions or detection technologies will not allow detection of a release within 24 hours, then specify the earliest practical time that detection can take place. Indicate why this longer period does not pose a threat to human health and the environment.
- E. Show how the secondary containment system is sloped or otherwise designed or operated to drain and remove liquids resulting from leaks, spills, or precipitation.
- F. Document how it will be ensured that spilled or leaked wastes and precipitation will be removed from the secondary containment system within twenty four (24) hours. If wastes and precipitation cannot be removed within 24 hours, then specify the earliest practical time that removal can take place. Indicate why this longer period does not pose a threat to human health and the environment.

D-2f(1)(d) Secondary Containment and Leak Detection Requirements for Ancillary Equipment: 703.202(g), 724.293(f)

You failed to provide the information on the ancillary equipment that will be installed or upgraded in 1991 for your tank system as required in the March 23, 1988 NOD letter. You must demonstrate that the tank system's ancillary equipment will be provided with secondary containment such as jacketing, double-walled piping, or a trench. Describe the containment system, and demonstrate that it will be designed, installed and operated to prevent any migration of waste or accumulated liquid to the soil, groundwater or surface water at any time during its use. Also, demonstrate that the containment system can detect and collect releases and accumulated liquids. This demonstration must include at least the following:

- A. Specify the materials of construction used to construct or line the system. Show that these materials are compatible with the wastes in the tank system.



- B. Demonstrate that the system has sufficient strength and thickness to prevent failure caused by any of the following:
- pressure gradients (including static head and external hydrological forces)
  - physical contact with the wastes
  - climatic conditions
  - stress of daily operation (including stresses from nearby vehicular traffic).
- C. Present calculations to prove that the secondary containment is placed on a foundation or base that is capable of providing support, resisting pressure gradients above and below the system, and preventing failure due to settlement, compression, or uplift.
- D. Provide a description of the leak detection system, including its operating principle, design features and operating procedures. Demonstrate that the leak detection system will detect the failure of either the primary or secondary containment structure or the presence of any release of hazardous waste or accumulated liquid in the secondary containment system within twenty four (24) hours. If the prevailing site conditions or detection technologies will not allow detection of a release within 24 hours, then specify the earliest practical time that detection can take place. Indicate why this longer period does not pose a threat to human health and the environment.
- E. Show how the secondary containment system is sloped or otherwise designed or operated to drain and remove liquids resulting from leaks, spills, or precipitation.
- F. Document how it will be ensured that spilled or leaked wastes and precipitation will be removed from the secondary containment system within twenty four (24) hours. If wastes and precipitation cannot be removed within 24 hours, then specify the earliest practical time that removal can take place. Indicate why this longer period does not pose a threat to human health and the environment.
- D-2f(2) Requirements for Tank Systems Until Secondary Containment is Implemented: 724.293(i)

To date, you have failed to provide the leak test for your underground tank and ancillary equipment as required in the March 23, 1988 NOD letter.

- F-4 Preventive Procedures, Structures and Equipment: 703.183(h)

F-4c Water Supplies: 703.183(h)(3)

You failed to include your response to comment for this part in the Part B narrative. This information must be included in the Part B narrative for this section to be complete.

F-4e Personnel Protection Equipment: 703.183(h)(5)

You failed to describe what personal equipment is used under daily activities as required in the March 23, 1988 NOD. Section 4.3.1 only describe what equipment is used under emergency procedures.

F-5c Management of Ignitable or Reactive Wastes in Containers: 703.201(c), 724.276

You failed to declare the distances between the storage building and the boundaries of your facility or between the paint shed and the boundaries as required in the March 13, 1988 NOD. You did not declare the distances on your reduced copy of the site plan (D12429) and if we are to try and measure the distances using the map scales, both distances show under 50 feet.

F-5e Management of Ignitable or Reactive Wastes in Tank Systems: 703.202(f), 724.298

You failed to declare the distance between the tank and the boundaries as required in the March 23, 1988 NOD. Also your site plan fails to show the location of the tank.

G. CONTINGENCY PLAN: 703.183(g), 724.150 through 724.156, 724.152(b)

G-1 General Information

You failed to provide the facility name and location, operator, site plan, and description of facility operations in the narrative of the Contingency Plan as required in the March 23, 1988 NOD.

I. CLOSURE AND POST-CLOSURE REQUIREMENTS: 703.183(m), 724.210 through 724.220

I-1d Inventory Removal, Disposal or Decontamination of Equipment, Structures and Soils: 724.212(b)(4), 724.214

You failed to provide a detail closure plan for your tank system as required in the March 23, 1988 NOD which includes a contingency for:

- A. Closure of the unit as a landfill; and
- B. Post-closure care and monitoring for the unit as a landfill.

This additional closure plan must include the following information:

I-1e Closure of Disposal Units: 703.183(m), 703.203(f), 703.204(h),  
703.207(e), 724.328(a)(2), 724.328(c)(1)(A), 724.358(c), 724.410(a)

Closure plans for all piles, landfills, tank systems and surface impoundments in which wastes or contaminated materials are to remain at closure must describe how the unit will be closed, including a description of the final cover to be established and its expected performance. Contingent closure plans for tank systems, surface impoundments and waste piles also must provide these descriptions.

I-1e(2) Cover Design: 724.328(a)(2)(C), 724.410(a)

The cover design and installation procedures should be thoroughly described. This submission should include:

- . Drawings showing cover layers, thicknesses, slopes and overall dimensions;
- . The common name, species and variety of the proposed cover crop;
- . Descriptions of synthetic liners to be used, including chemical properties, strength, thickness and manufacturer's specifications;
- . Description of rationale for cover selection;
- . Descriptions of and specifications for protective materials placed above and below synthetic liners;
- . Clay liner characteristics, including thickness and hydraulic conductivity; and
- . Clay liner construction plans, including lift sequencing.

I-1e(3) Minimization of Liquid Migration: 724.328(a)(2)(C)(i), 724.410(a)

For cover designs different than EPA-recommended designs (refer to Permit Applicant's Guidance Manual), provide engineering calculations showing that the proposed cover will provide long-term minimization of liquid migration through the cover.

I-1e(4) Maintenance Needs: 724.328(a)(2)(C)(ii), 724.410(a)

Demonstrate that the cover system will function effectively with minimum maintenance needs.

I-1e(5) Drainage and Erosion: 724.328(a)(2)(C)(iii), 724.410(a)

Provide the following information:

- . Data demonstrating that the proposed final slopes will not cause significant cover erosion;
- . Descriptions of drainage materials and their hydraulic conductivities;
- . Engineering calculations demonstrating free drainage of precipitation off of and out of the cover; and
- . Estimation of the potential for drainage-layer clogging.

I-1e(6) Settlement and Subsidence: 724.328(a)(2)(C)(iv), 724.410(a)

Describe potential cover settlement and subsidence, considering immediate settlement, primary consolidation, secondary consolidation, and creep and liquefaction. Include the following information:

- . Potential foundation compression;
- . Potential soil liner compression; and
- . Potential waste consolidation and compression resulting from waste dewatering, biological oxidation and chemical conversion of solids to liquids.

Describe the effects of potential subsidence/settlement on the ability of the final cover to minimize infiltration.

I-1e(7) Cover Permeability: 724.328(a)(2)(C)(v), 724.410(a)

- . Demonstrate that the cover system will have a permeability less than or equal to that of the liner system.

I-1e(8) Freeze/Thaw Effects: 724.328(a)(2)(C), 724.410(a)

Identify the average depth of frost penetration and describe the potential effects of freeze/thaw cycles on the cover.

I-1f Schedule for Closure: 724.212(b)(6)

Provide a schedule for closure of each hazardous waste management unit and for final closure of the facility, including total time to close each hazardous waste management unit and the time required for intervening closure activities. This will allow tracking of the progress of closure.

I-1g Extensions of Closure Time: 724.213

Submit a petition for a schedule for closure which exceeds the 90 days for treatment, removal or disposal of wastes and/or the 180 days for completion of closure activities which justifies that a longer period of closure time is required.

I-2 Post-Closure Plan: 703.183(m), 703.203(f), 703.204(h), 703.207(e), 724.218, 724.297(b) and (c), 724.328(b), 724.328(c)(1)(B), 724.380(c), 724.410(b)

Submit a copy of the most recent post-closure plan or, if applicable, the contingent post-closure plan. Landfill, surface impoundment and waste pile post-closure plans should address Items I-2a, b and c; land treatment unit post-closure plans should address Item I-2d.

I-2a Inspection Plan: 724.218(b), 724.328(b), 724.328(c)(1)(B), 724.358(b), 724.358(c)(1)(B), 724.380(c), 724.410(b)

Describe the inspections to be conducted during the post-closure care period, their frequency, the inspection procedure, and the logs to be kept. The following items, as applicable, should be included in the inspection plan:

- . Security control devices;
- . Erosion damage;
- . Cover settlement, subsidence and displacement;
- . Vegetative cover condition;
- . Integrity of run-on and run-off control measures;
- . Cover drainage system functioning;
- . Leak detection system;
- . Leachate collection and removal system;
- . Gas venting system;
- . Well condition; and
- . Benchmark integrity.

The rationale for determining the length of time between inspections should be provided.

I-2b Post-Closure Monitoring Plan: 724.328(b), 724.328(c)(1)(B), 724.358(b),  
724.358(c)(1)(B), 724.410(b)

Describe the monitoring to be conducted during the post-closure care period, including, as applicable, the procedures for conducting and evaluating the data gathered from:

- . Groundwater monitoring;
- . Leachate collection and removal; and
- . Leak detection between liners.

I-2c Post-Closure Maintenance Plan: 724.328(b), 724.328(c)(1)(B),  
724.358(b), 724.358(c)(1)(B), 724.410(b)

Describe the preventive and corrective maintenance procedures, equipment requirements and material needs. Include the following items in the maintenance plan, as applicable:

- . Repair of security control devices;
- . Erosion damage repair;
- . Correction of settlement, subsidence and displacement;
- . Mowing, fertilization and other vegetative cover maintenance;
- . Repair of run-on and run-off control structures;
- . Leachate removal system maintenance; and
- . Well replacement.

Describe the rationale to be used to determine the need for corrective maintenance activities.

I-3 Notice in Deed and Certification: 703.183(n), 724.216, 724.217(c),  
724.219

In your November 3, 1988 response to our March 23, 1988 NOD letter, you stated that the facility would submit a Notice in Deed at a later date. To date, you have failed to provide a copy of the notice or notation recorded in the deed to the facility property, or on some other instrument which is normally examined during title search, that will in perpetuity notify any potential purchaser of the property that (1) the land has been used to manage hazardous wastes; (2) its use is restricted; and (3) the survey plat and record of the type, location, and quantity of hazardous wastes disposed of within each cell or area of the facility has been filed with the County Recorder, to any local zoning authority or the authority with jurisdiction over local land use and with the Agency. For hazardous wastes disposed prior to January 12, 1981, identify the type, location and quantity of the hazardous waste to the best of the owner or operator's knowledge and in accordance with any records the owner or operator has kept. Submit a certification to the Agency, signed by the owner or operator, that the owner or operator has properly recorded this certification.

I-5e Financial Test and Corporate Guarantee for Closure: 724.243(f),  
724.251(f), 40 CFR 264.151(h)

The copy of your Letter of Credit which was submitted with your November 3, 1988 response is of poor quality and illegible, Please submit a legible copy.

K. PART B CERTIFICATION: 703.182

K-1 Facility Certification: 702.126

Re-applications must be accompanied by a certification letter as specified in 702.126(d). The required signatures are as follows: (1) for a corporation, a principal executive officer (at least at the level of vice-president); (2) for a partnership or sole proprietorship, a general partner or the proprietor, respectively; (3) for a municipal, state, Federal, or other public agency, either a principal executive officer or ranking elected official.

K-2 Engineering Certification: 703.182, Illinois Professional Engineering Act

Any new technical data, such as design drawings, specifications and engineering studies, must be certified (sealed) by a Professional Engineer who is licensed to practice in the State of Illinois in accordance with Ill. Rev. Stat., par. 5101, Sec. 1 and par. 5119, Sec. 13.1.



Certified Mail - Return Receipt Requested

February 16, 1988  
EJJ 88-136

RECEIVED

FEB 29 1988

U. S. EPA, REGION V  
SWB - PMS

Mr. Lawrence W. Eastep  
Manager, Permit Section  
Illinois Environmental Protection Agency  
2200 Churchill Road  
Springfield, IL 62706

Subject: Pekin Service Center  
Part B Permit Application

Dear Mr. Eastep:

Pursuant to 35 Illinois Administrative Code 703.121, Safety-Kleen Corp. is submitting a Part B permit application to store hazardous wastes in a tank and in containers at its facility in Pekin. The enclosed contains the text and support documents (including a Part A permit application) necessary to meet the requirements set forth in Title 35 of the Illinois regulations.

If you have any questions or require further information, please contact me on extension 2246.

Sincerely,



Ellen J. Jurezak, P.E.  
Environmental Engineer/  
Permits Manager

EJJ/dfs

Enclosures

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FEB 19 1988

IEPA-DLPO

COPY 2





January 24, 1994

Mr. Ron Harmon  
Illinois Environmental Protection Agency  
2200 Churchill Rd.  
Springfield, IL 62794

RE: 1790600011 - Tazwell County  
Safety-Kleen Corp.  
ILLD093862811  
RCRA Permit Log No. 96

B.1.8

Dear Mr. Harmon,

Please find enclosed three copies of the letter from the Pekin Police Department acknowledging they are willing to provide assistance in the event of an emergency at the subject facility. This information will be incorporated into the subject facility's operating log.

If you have any questions, or require additional information, please feel free to contact me at 708/468-6580.

Sincerely,



Jennifer M. Jendras  
Environmental Engineer

cc: Roger Brotherton, EHS 1440

RECEIVED

JAN 31 1994

PERMIT SECTION



1-4-94

(Date)

Chief Robert Burress  
Pekin Police Dept.  
400 Margaret  
Pekin, IL 60120

Ms. Jennifer M. Jendras  
Environment, Health and Safety Department  
Safety-Kleen Corp.  
1000 Randall Road  
Elgin, IL 60123

Subject: Safety-Kleen Pekin, IL Service Center

Dear Ms. Jendras:

We have received the updated Safety-Kleen contingency plan for the <sup>Pekin</sup>~~Elgin~~ Service Center. It has been incorporated into our copy of the plan.

This letter acknowledges that we have received a copy of the contingency plan, have been familiarized with the action necessary in the event of an emergency and are willing to provide assistance.

Sincerely yours,

Robert D Burress  
(Signature)  
Chief of Police  
(Title)

RECEIVED

JAN 31 1994

RECEIVED SECTION



State of Illinois

# ENVIRONMENTAL PROTECTION AGENCY

Mary A. Gade, Director

2200 Churchill Road, Springfield, IL 62794-9276

217/782-5562

June 7, 1993

Dear Ms. Weiss:

Enclosed please find the binders of information that we discussed by phone on June 1, 1993. The information is relevant to the Resource Conservation and Recovery Act (RCRA) permit that the Safety-Kleen Corporation is required to obtain in order to continue storing hazardous waste. It is very important that citizens in the area of Safety-Kleen have the opportunity to review the application materials submitted by the company and the draft permits proposed by the state and federal Environmental Protection Agencies.

The best place for citizens to begin review of the permit information is the thin, black binder entitled Draft Permits and Related Materials. The other binders contain all the background information referenced in the draft permit. My name and phone number are also listed in the thin, black binder in case citizens have questions regarding this process. Written comments should be sent to me by August 7, 1993.

These binders should not be allowed to circulate since interested citizens might then be prevented from reviewing the materials during the 45 day comment period. At the end of the permit process (approximately 6-9 months) one of our staff members will pick up the informational binders unless you prefer to keep them.

I would appreciate it if you would complete the attached verification form and return it to me in the enclosed postage paid envelope. Thanks again for your cooperation in this effort.

Sincerely,

Bradley Frost  
Community Relations Coordinator  
Office of Community Relations

B-90

Harding Lawson Associates



November 4, 1992

Mr. Ron Harmon  
Division of Land Pollution Control  
Illinois Environmental Protection Agency  
P.O. Box 19276  
Springfield, Illinois 62794-9276

RECEIVED

NOV 09 1992

IEPA-DLPC

RE: SAFETY-KLEEN CORPORATION  
PEKIN, ILLINOIS  
ILD093862811

Dear Mr. Harmon,

Per your recent request for additional information beyond that previously presented in Section F.3,a,(4) and Appendix F of the RCRA Part B Permit Application for the Safety-Kleen facility located in Pekin, Illinois (facility) regarding how fire fighting will be performed by the Cincinnati Township Fire Protection District (CTFPD) in the event of a large fire at the facility, Harding Lawson Associates (HLA) has contacted the Fire Chief of the CTFPD and presents this information in response to your concerns in the following paragraphs.

On October 27, 1992 Mr. Thomas A. Gavagan of HLA contacted Mr. Jerry Privett, Fire Chief of the CTFPD by telephone and requested that he provide information on equipment and procedures that would be used by the CTFPD in responding to a large fire at the Safety-Kleen facility in Pekin, Illinois.

Mr. Privett indicated that the nearest fire hydrant is one-half to three-quarters mile from the facility and therefore unable to be used directly in fighting a fire at the facility as this is too far to supply hoses.

42

In the event of a fire call from the facility, The CTFPD would respond immediately with a pumper truck and either a 3000 gallon or 2000 gallon water tanker which should arrive at the facility in approximately 7 minuets.

If additional equipment is needed, the CTFPD would send their second pumper truck , water tanker, and three (3) portable fire water tanks (2000 gallon, 2000 gallon, and 1000 gallon). The portable tanks would be used as reservoir supply to the pumper trucks and would be refilled by the water tankers. Also, more equipment may be requested from surrounding mutual aid fire districts in the nearby communities. These mutual aid fire districts would supply both fire trucks and water tankers on request. For example, The Green Valley Fire District is approximately 12 minuets response time away from the facility and has a 3000 gallon water tanker. The Manato Fire District is approximately 20 minuets response time away from the facility and has a 5000 gallon, and 2 - 2000 gallon water tankers. The water tankers would keep the portable tanks full and refill at both the nearest hydrant and at Power Lake (a 1750 acre lake) which is approximately 2 miles distant from the facility.

During a field test conducted by the CTFPD last summer, water tankers were able to load at approximately 330 gallons per minuet and unload into the portable tanks at 2000 gallons per minuet. During the same test, the CTFPD maintained greater than 600 gallons per minuet fire water flow from their pumper truck (single hose).

Additionally, Safety-Kleen is installing a fire protection sprinkler system throughout the entire new facility which is presently under construction. The new facility's fire protection sprinkler system will be connected to the Pekin/Tazewell County fire water supply main upon completion of the extension of the fire water supply main to the new facility

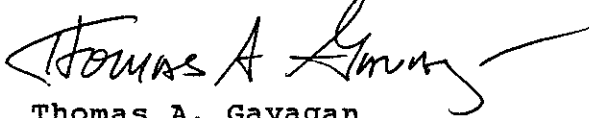
HLA believes that this information satisfies your request and indicates that adequate fire protection exists to respond to a fire emergency at the Safety-Kleen facility in Pekin, Illinois if necessary.

Enclosed find one original and three copies of this letter. Please place a copy of this letter in Appendix F as exhibit F-6 in each of the RCRA Part B Permit Application copies for Pekin.

Should you have any questions, please contact Mr. Thomas A. Gavagan of HLA at 314-275-4414.

Sincerely,

HARDING LAWSON ASSOCIATES

A handwritten signature in black ink, appearing to read "Thomas A. Gavagan", with a long horizontal flourish extending to the right.

Thomas A. Gavagan  
Principal Environmental Scientist

cc: Roger Brotherton  
Ellen Jurczak  
Alan Raymond

B-96

cc: Peoria/USEPA

JWC  
RAH

**Harding Lawson Associates**



**Transmittal/Memorandum**

---

**To:** Ron Harmon  
Division of Land Pollution Control  
Illinois Environmental Protection Agency  
2200 Churchill Road  
Springfield, Illinois 62794-9276

---

**From:** Susan Harris  
**Date:** September 11, 1992  
**Subject:** Safety-Kleen, Pekin (ILD 093862811)  
**Job No.:**

---

**Remarks:**

Per your recent request, HLA is submitting the documentation in response to item F-3(a)(4) for the above referenced facility's RCRA Part B permit application. The documentation is in the form of a letter which confirms a telephone conversation regarding the services the emergency response agencies will provide in the event of an emergency. An authorized representative of the response agency has acknowledged the receipt of the letter and its accuracy by signing the letter and returning a copy to HLA. Additional correspondence from the City of Pekin and the Office of the Illinois State Fire Marshall has also been included for your reference.

If you have any additional questions, please do not hesitate to contact me.

RECEIVED  
SEP 14 1992  
IEPA-DLPC

---

**cc:** Alan Raymond      Roger Brotherton  
Ellen Jurczak  
Gary McLagan

---

41



August 21, 1992

Jerry Privett  
Fire Chief  
Cincinnati Fire Protection District  
11751 Wagonseller Road  
Pekin, Illinois 61554  
(309) 348-3070

RE: Emergency Response to the Pekin, IL Safety-Kleen Service Center (5-136-01)  
Rural Route #3, Pekin, IL 61554, (309) 346-1818

Dear Mr. Privett:

On behalf of Safety-Kleen Corporation (SKC), Harding Lawson Associates (HLA) is preparing the RCRA Part B permit application for the Pekin Safety-Kleen service facility located at Rural Route #3, Pekin, IL. As part of the permit application preparation, the State of Illinois requires documentation of preparedness and prevention for water and fire control. The purpose of this letter is intended to confirm the emergency response understanding between the Cincinnati Fire Protection District (the "District") and the Pekin Safety-Kleen facility.

Based on information obtained during an August 20, 1992 telephone conversation with an officer of the District, it is my understanding that the District is the first responder in the case of a fire or hazardous material emergency at the Pekin Safety-Kleen facility. In accordance with the Local Emergency Planning Committee (LEPC) emergency plan and a mutual aid agreement, the Pekin Fire Department and Haz Mat Team will respond to a fire or hazardous material emergency at the Safety-Kleen facility if the District requires additional aid. The Cincinnati Fire Protection District is properly equipped and trained for responding to normal fire emergencies at the Pekin Safety-Kleen facility. The District is also familiar with the Safety-Kleen facility plant lay-out and location of hazardous material storage.

If the information in this letter is inaccurate or incorrect in any way, or if the information in this letter becomes inaccurate or incorrect at any time in the future, a written documented response is requested and expected from the Cincinnati Fire Protection District explaining the inaccuracies or misunderstandings. Such documentation should be directed to the Safety-Kleen Service Center, Facility Branch Office, Rural Route #3, Pekin, IL 61554.

This document represents one of two original and identical letters. Solely for the purpose of providing documentation for the State of Illinois pursuant to RCRA Part B permit application requirements, Safety-Kleen requests the signature of a duly authorized officer of the Cincinnati Fire Protection District acknowledging the receipt of this letter and acknowledging the accuracy of the above described emergency response relationship with the Pekin Safety-Kleen service facility:

Name Jerry Privett

Title Chief

Safety-Kleen requests the above signature be provided for both original documents. Please return, within one week, one of the signed original documents to the Harding Lawson Associates address provided below to be added



to the Pekin Safety-Kleen facility RCRA Part B permit application. Please keep the other signed original in your office files with your copy of the Pekin Safety-Kleen facility Contingency Plan.

If you have any other questions or comments regarding this matter, please contact the HLA St. Louis office at (314) 275-4414 or the Pekin Safety-Kleen facility branch manager at (309) 346-1818.

Sincerely,

A handwritten signature in black ink that reads "FRED LAMAR". The signature is written in a cursive, slightly stylized font.

Fred Lamar  
Staff Engineer

cc. A. Raymond, SKC Regional Environmental Manager  
R. Brotherton, SKC Pekin Facility Branch Manager

# City of Pekin

**FIRE DEPARTMENT**  
400 MARGARET STREET  
PEKIN, ILLINOIS 61554  
(309) 477-2388

JOSEPH W. WEGHORST  
Fire Chief

DON WILLIAMS  
Mayor

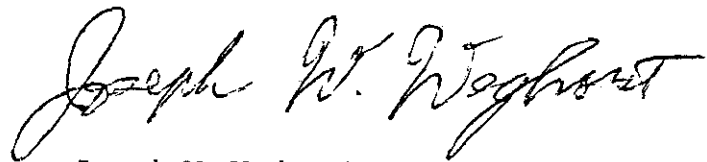
Office of: Joseph W. Weghorst

August 24, 1992

Quest Tec Corp  
4812 Santana Circle  
Columbia, Missouri 65203

Attention: Bill Gibbs

As per our phone conversation, the Pekin Fire Department would respond to Safety Clean at 14249 V.F.W. Road, only on request for mutual aid from the Cincinnati Fire Protection District. This would be a second alarm.



Joseph W. Weghorst  
Fire Chief

JWW:djb



Office of the Illinois  
**State Fire Marshal**

General Office  
217-785-0969

Divisions

ARSON INVESTIGATION  
217-782-8855

BOILER and PRESSURE  
VESSEL SAFETY  
217-782-2696

FIRE PREVENTION  
217-785-4714

MANAGEMENT SERVICES  
217-782-9889

INFIRS  
217-785-1016

PERSONNEL  
217-785-1009

PERSONNEL STANDARDS  
and EDUCATION  
217-782-4542

PETROLEUM and  
CHEMICAL SAFETY  
217-785-5878

PUBLIC INFORMATION  
217-785-1021

August 11, 1992

Bill Gibbs  
Questech Company  
4182 Santan Circle  
Columbia, MO 65203

Dear Mr. Gibbs:

Requirements for fire systems for bulk storage locations are taken from *41 Illinois Administrative Code*, Chapter 1, Section 160.30. 2)A)i)ii), B)i)ii)b)c), and the conformance with *Flammable and Combustible Liquids Code*, NFPA - #30, 1981 edition, Chapter 2-8, pg. 44, Chapter 6-8.1, 6-8.2, 6-8.3. I hope that this information helps answer your question.

References: NFPA 15 - Water Spray Fixed Systems  
NFPA 16 - Deluge Foam and Water Systems  
NFPA 24 - Private Fire Service Mains

If I can be of further help, please feel free to call.

Sincerely,

A handwritten signature in dark ink, appearing to read "Jack Cunningham".

Jack Cunningham  
Regional Administrator

JC/cab

B-94

cc: Peoria  
USEPA

DWC  
RAH

Harding Lawson Associates



Transmittal/Memorandum

**To:** Ron Harmon  
Division of Land Pollution Control  
Illinois Environmental Protection Agency  
2200 Churchill Road  
Springfield, Illinois 62794-9276

**From:** Susan Harris  
**Date:** August 26, 1992  
**Subject:** Safety-Kleen, Pekin (ILD 093862811)  
**Job No.:**

**Remarks:**

Per your recent request, HLA is submitting four copies of color photographs for Exhibit D-9, documentation in response to section F-3(a)(4), and a revised assessment of the container storage area.

The documentation requested in response to item F-3(a)(4) is in the form of a letter which confirms a telephone conversation regarding the services the emergency response agencies will provide. An authorized representative is requested to acknowledge the receipt of the letter and its accuracy by signing the letter and returning a copy to HLA. A copy of the signed letters will be forwarded to your office upon its receipt.

A more recent container storage area assessment (dated 12/91) has been enclosed and is intended to replace the prior assessment included as Exhibit D-7, performed by PRC. The recommendation of the recent assessment included hydrostatic testing of the containment trench, which is scheduled to occur within the next 30 days. A report summarizing the site visit and hydrostatic testing will be forwarded to your office.

If you have any additional questions, please do not hesitate to contact me.

RECEIVED

AUG 28 1992

IEPA-DLPC

**cc:** Alan Raymond  
Ellen Jurczak  
Gary McLagan

Roger Brotherton

Engineering and  
Environmental Services

One Tower Lane, Suite 1300, Oakbrook Terrace, IL 60181 708/571-2162 Telecopy 708/571-0439

A Subsidiary of Harding Associates • Offices Nationwide

40

B-96

cc: Peoria  
USEPA

DWC  
RAH

Harding Lawson Associates



Transmittal/Memorandum

**To:** Ron Harmon  
Division of Land Pollution Control  
Illinois Environmental Protection Agency  
2200 Churchill Road  
Springfield, Illinois 62794-9276

**From:** Susan Harris SAU  
**Date:** August 10, 1992  
**Subject:** Safety-Kleen, Pekin (ILD 093862811)  
**Job No.:**

**Remarks:**

Per your recent request, four copies of a more detailed zoning map have been included in this submittal. It is intended to replace Exhibit B-6a in the current application.

I have contacted Questec, Inc. to request color photographs for Exhibit D-9 and the overhead door, as well as documentation in response to section F-3(a)(4); these will be submitted to you upon their receipt.

If you have any additional questions, please do not hesitate to contact me.

RECEIVED

AUG 11 1992

IEPA-DLPC

**cc:** Alan Raymond  
Ellen Jurczak  
Gary McLagan

31

B-96

cc: Peoria  
USEPA

DWC  
RAH

Harding Lawson Associates



Transmittal/Memorandum

**To:** Ron Harmon  
Division of Land Pollution Control  
Illinois Environmental Protection Agency  
2200 Churchill Road  
Springfield, Illinois 62794-9276

**From:** Susan Harris *SH*  
**Date:** August 3, 1992  
**Subject:** Safety-Kleen, Pekin (ILD 093862811)  
**Job No.:**

**Remarks:**

Per your request today, additional copies of the appendices for Exhibit D-8 are enclosed.

According to Mr. Steve Fleming, Safety-Kleen Project Engineer, the waste antifreeze tank will most likely be installed late this year. Therefore, page D-11 of the permit has been revised to indicate that the spent antifreeze tank will be installed in 1992, rather than 1991. Copies of the revised page is also enclosed.

I have contacted Questec, Inc. to request color photographs for Exhibit D-9, and these will be submitted to you upon their receipt.

If you have any additional questions, please do not hesitate to contact me.

RECEIVED

AUG 04 1992

IEPA-DLPC

**cc:**

Alan Raymond  
Ellen Jurczak

B-96

cc: Peoria  
USEPA

DWC  
RAH

**Harding Lawson Associates**



**Transmittal/Memorandum**

**To:** Mr. Ron Harmon  
Division of Land Pollution Control  
Illinois Environmental Protection Agency  
2200 Churchill Road  
Springfield, Illinois 62794-9276

**From:** Susan Harris *GAH*  
**Date:** July 31, 1992  
**Subject:** Safety-Kleen, Pekin (ILD 093862811)  
**Job No.:**

**Remarks:**

Per your request on July 28, additional copies of Tables G-1 and G-2 for the Safety-Kleen Part B permit application have been enclosed.

In response to your request for Exhibit D-11 to be modified to include a 55-gallon drum for spent anti-freeze, this specification is referenced in Exhibit D-10. Exhibit D-10 lists all possible container specifications for each type of waste handled at the facility. If a DOT specification is not available, additional specifications are attached as Exhibit D-11 (see note b on Exhibit D-10). Exhibit D-10 lists DOT specifications for the 55-gallon drum for waste antifreeze. We regret any confusion that this may have caused.

If you have any further questions or would like any additional information, please do not hesitate to contact me.

RECEIVED  
AUG 03 1992  
IEPA-DLPC

**cc:** Alan Raymond

37



August 21, 1992

John Hamann  
Hazardous Materials Officer  
Pekin Fire Department  
3232 Court Street  
Pekin, Illinois 61554  
(309)477-2388

RE: Emergency Response to the Pekin, IL Safety-Kleen Service Center (5-136-01)  
Rural Route #3, Pekin, IL 61554, (309) 346-1818

Dear Mr. Hamann:

On behalf of Safety-Kleen Corporation (SKC), Harding Lawson Associates (HLA) is preparing the RCRA Part B permit application for the Pekin Safety-Kleen service facility located at Rural Route #3, Pekin, IL. As part of the permit application preparation, the State of Illinois requires documentation of preparedness and prevention for water and fire control. The purpose of this letter is intended to confirm the emergency response understanding between the Pekin Fire Department and the Pekin Safety-Kleen facility.

Based on information obtained during an August 20, 1992 telephone conversation with you, it is my understanding that the Pekin Fire Department has a hazardous materials team ("Haz Mat Team") that responds to hazardous material emergencies in the County of Tazewell. In accordance with the Local Emergency Planning Committee (LEPC) emergency plan, the Pekin Fire Department and Haz Mat Team will respond to a fire or hazardous material emergency at the Safety-Kleen facility if the Cincinnati Fire Protection District (who is the first responder) requires additional aid. The Pekin Haz Mat Team is properly equipped and trained to respond to hazardous material spills and releases. The Pekin Haz Mat Team is also familiar with the Safety-Kleen facility plant lay-out and location of hazardous material storage.

If the information in this letter is inaccurate or incorrect in any way, or if the information in this letter becomes inaccurate or incorrect at any time in the future, a written documented response is requested and expected from the Pekin Fire Department and/or Tazewell Haz Mat Team explaining the inaccuracies or misunderstandings. Such documentation should be directed to the Safety-Kleen Service Center, Facility Branch Office, Rural Route #3, Pekin, IL 61554.

This document represents one of two original and identical letters. Solely for the purpose of providing documentation for the State of Illinois pursuant to RCRA Part B permit application requirements, Safety-Kleen requests the signature of a duly authorized officer of the Pekin Fire Department or Pekin Haz Mat Team acknowledging the receipt of this letter and acknowledging the accuracy of the above described emergency response relationship with the Pekin Safety-Kleen service facility:

\_\_\_\_\_  
Name

\_\_\_\_\_  
Title

Safety-Kleen requests the above signature be provided for both original documents. Please return, within one weeks time, one of the signed original documents to the Harding Lawson Associates address provided below to be added



to the Pekin Safety-Kleen facility RCRA Part B permit application. Please keep the other signed original in your office files with your copy of the Pekin Safety-Kleen facility Contingency Plan.

If you have any other questions or comments regarding this matter, please contact the HLA St. Louis office at (314) 275-4414 or the Pekin Safety-Kleen facility branch manager at (309) 346-1818.

Sincerely,

A handwritten signature in dark ink that reads "FRED LAMAR". The signature is written in a cursive, slightly slanted style.

Fred Lamar  
Staff Engineer

cc. A. Raymond, SKC Regional Environmental Manager  
R. Brotherton, SKC Pekin Facility Branch Manager



**CERTIFIED MAIL  
RETURN RECEIPT REQUESTED**

October 20, 1997

Mr. Scott Hacke  
Illinois Environmental Protection Agency  
Division of Land Pollution Control  
Permit Section  
2200 Churchill Road  
Springfield, Illinois 62794-9276

Re: Part B Permit/Annual Contingency Plan Review  
Pekin, Illinois Service Center  
ILD093862811

Dear Mr. Harmon:

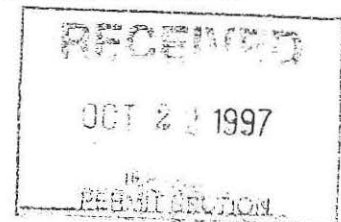
As required under Section D.VI.E., this submittal serves as documentation that Safety-Kleen Corp. has made an attempt to conduct an annual review of all components of the contingency plan with the local emergency response agencies. The enclosed letters include the meeting information provided to the emergency response agencies. All response letters or nonresponse from the agencies will be kept on file at the facility. Meeting notes and a list of attendees will also be maintained at the facility.

If you have any questions, please contact me at 515/266-0319.

Sincerely,

Mori Sorenson  
Environment, Health and Safety Manager  
West Central Region

enc.



B-96



cc: Peoria  
USEPA

Bill

ILD 093 862 811

**CERTIFIED MAIL  
RETURN RECEIPT REQUESTED**

October 4, 1996

Mr. Ron Harmon  
Illinois Environmental Protection Agency  
Division of Land Pollution Control  
Permit Section  
2200 Churchill Road  
Springfield, Illinois 62794-9276

Re: Part B Permit/Annual Contingency Plan Review  
Pekin, Illinois Service Center  
ILD093862811

Dear Mr. Harmon:

As required under Section D.V.E., this submittal serves as documentation that Safety-Kleen Corp. has made an attempt to conduct an annual review of all components of the contingency plan with the local emergency response agencies. The enclosed letters include the meeting information provided to the emergency response agencies. All response letters or nonresponse from the agencies will be kept on file at the facility. Meeting notes and a list of attendees will also be maintained at the facility.

If you have any questions, please contact me at 515/266-0319.

Sincerely,

A handwritten signature in cursive script that reads 'Mori Sorenson'.

Mori Sorenson  
Environment, Health and Safety Manager  
West Central Region

enc.

RECEIVED  
ENVIRONMENTAL PROTECTION AGENCY

NOV 01 1996

BUREAU OF LAND POLLUTION CONTROL  
STATE OF ILLINOIS



RECEIVED  
NOV 07 1996  
IEPA-DLPC



**CERTIFIED MAIL  
RETURN RECEIPT REQUESTED**

October 4, 1996

Mr. Dean Schlee  
Hazardous Materials Specialist  
Illinois Emergency Management Agency  
110 East Adams  
Springfield, Illinois 62701-9963

Re: Pekin, Illinois Service Center  
14249 VFW Road  
Pekin, IL 61554

Dear Mr. Schlee:

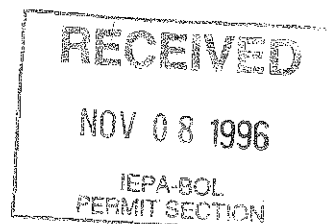
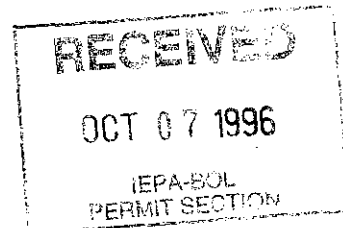
As required by our facilities Hazardous Waste Management RCRA Part B Permit, Safety-Kleen is required to attempt to arrange a meeting with the local emergency response entities to review all components of the contingency plan. Safety-Kleen has scheduled this meeting on November 13, 1996, at 10:00 a.m. Please indicate on the attached acknowledgment letter whether or not a representative from your agency will be attending.

If you have any questions, please contact me at 515/266-0319.

Sincerely,

Mori Sorenson  
Environment, Health and Safety Manager  
West Central Region

enc.



## ACKNOWLEDGMENT LETTER

Illinois Emergency Management Agency  
110 East Adams  
Springfield, Illinois 62701-9963

Mr. Mori Sorenson  
Safety-Kleen Corp.  
4704 NE 22nd Street  
Des Moines, Iowa 50313

Re: Contingency Plan Review Meeting  
Safety-Kleen Pekin, IL Service Center

Dear Mr. Sorenson:

\_\_\_\_\_ Yes - A representative of Illinois Emergency Management Agency will attend the meeting on November 13, 1996.

\_\_\_\_\_ No - A representative of Illinois Emergency Management Agency will not be attending the meeting on November 13, 1996.

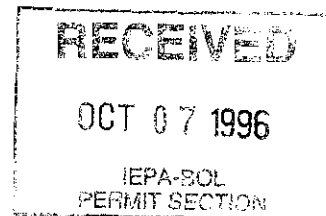
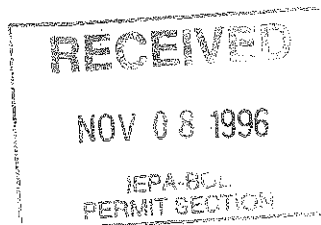
\_\_\_\_\_  
(Name - Please Print)

\_\_\_\_\_  
(Signature)

\_\_\_\_\_  
(Title)

\_\_\_\_\_  
(Date)

\_\_\_\_\_ Please check here if you do not have a copy of Safety-Kleen's contingency plan and one will be sent to you.





**CERTIFIED MAIL  
RETURN RECEIPT REQUESTED**

October 4, 1996

Mr. John Hamann  
Fire Chief  
Pekin Fire Department  
3232 Court Street  
Pekin, Illinois 61554

Re: Pekin, Illinois Service Center  
14249 VFW Road  
Pekin, IL 61554

Dear Mr. Hamann:

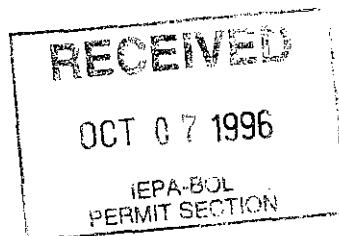
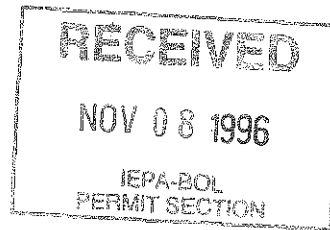
As required by our facilities Hazardous Waste Management RCRA Part B Permit, Safety-Kleen is required to attempt to arrange a meeting with the local emergency response entities to review all components of the contingency plan. Safety-Kleen has scheduled this meeting on November 13, 1996, at 10:00 a.m. Please indicate on the attached acknowledgment letter whether or not a representative from your agency will be attending.

If you have any questions, please contact me at 515/266-0319.

Sincerely,

Mori Sorenson  
Environment, Health and Safety Manager  
West Central Region

enc.



## ACKNOWLEDGMENT LETTER

Pekin Fire Department  
3232 Court Street  
Pekin, Illinois 61554

Mr. Mori Sorenson  
Safety-Kleen Corp.  
4704 NE 22nd Street  
Des Moines, Iowa 50313

Re: Contingency Plan Review Meeting  
Safety-Kleen Pekin, IL Service Center

Dear Mr. Sorenson:

\_\_\_\_\_ Yes - A representative of Pekin Fire Department will attend the meeting on November 13, 1996.

\_\_\_\_\_ No - A representative of Pekin Fire Department will not be attending the meeting on November 13, 1996.

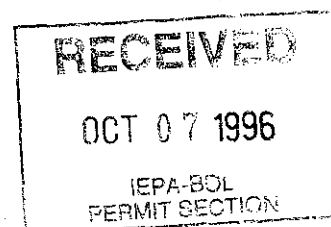
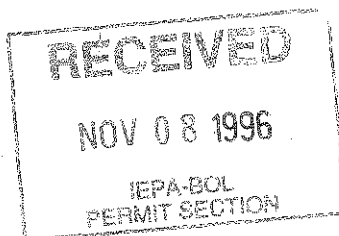
\_\_\_\_\_  
(Name - Please Print)

\_\_\_\_\_  
(Signature)

\_\_\_\_\_  
(Title)

\_\_\_\_\_  
(Date)

\_\_\_\_\_ Please check here if you do not have a copy of Safety-Kleen's contingency plan and one will be sent to you.





**CERTIFIED MAIL  
RETURN RECEIPT REQUESTED**

October 4, 1996

Mr. George A Saal, Jr.  
Chairman  
Tazwell County Sheriff  
11 South 4th Street  
Pekin, Illinois 61554

Re: Pekin, Illinois Service Center  
14249 VFW Road  
Pekin, IL 61554

Dear Mr. Saal:

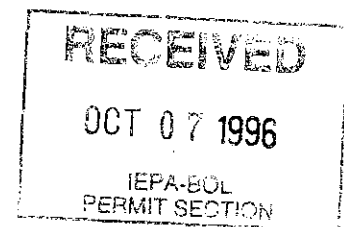
As required by our facilities Hazardous Waste Management RCRA Part B Permit, Safety-Kleen is required to attempt to arrange a meeting with the local emergency response entities to review all components of the contingency plan. Safety-Kleen has scheduled this meeting on November 13, 1996, at 10:00 a.m. Please indicate on the attached acknowledgment letter whether or not a representative from your agency will be attending.

If you have any questions, please contact me at 515/266-0319.

Sincerely,

Mori Sorenson  
Environment, Health and Safety Manager  
West Central Region

enc.





## ACKNOWLEDGMENT LETTER

Tazwell County Sheriff  
11 South 4th Street  
Pekin, Illinois 61554

Mr. Mori Sorenson  
Safety-Kleen Corp.  
4704 NE 22nd Street  
Des Moines, Iowa 50313

Re: Contingency Plan Review Meeting  
Safety-Kleen Pekin, IL Service Center

Dear Mr. Sorenson:

\_\_\_\_\_ Yes - A representative of Tazwell County Sheriff Department will attend the meeting on November 13, 1996.

\_\_\_\_\_ No - A representative of Tazwell County Sheriff Department will not be attending the meeting on November 13, 1996.

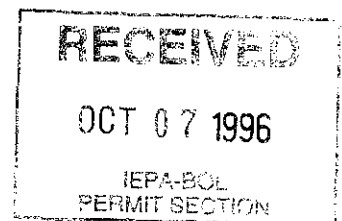
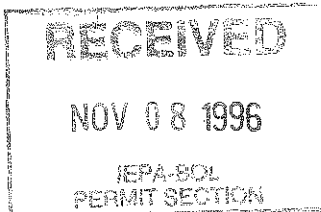
\_\_\_\_\_  
(Name - Please Print)

\_\_\_\_\_  
(Signature)

\_\_\_\_\_  
(Title)

\_\_\_\_\_  
(Date)

\_\_\_\_\_ Please check here if you do not have a copy of Safety-Kleen's contingency plan and one will be sent to you.





**CERTIFIED MAIL  
RETURN RECEIPT REQUESTED**

October 4, 1996

Mr. Robert G. Burress  
Chief of Police  
Pekin Police Department  
400 Margaret Street  
Pekin, Illinois 61554

Re: Pekin, Illinois Service Center  
14249 VFW Road  
Pekin, IL 61554

Dear Mr. Burress:

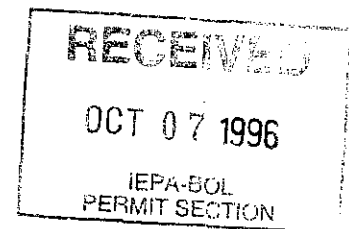
As required by our facilities Hazardous Waste Management RCRA Part B Permit, Safety-Kleen is required to attempt to arrange a meeting with the local emergency response entities to review all components of the contingency plan. Safety-Kleen has scheduled this meeting on November 13, 1996, at 10:00 a.m. Please indicate on the attached acknowledgment letter whether or not a representative from your agency will be attending.

If you have any questions, please contact me at 515/266-0319.

Sincerely,

Mori Sorenson  
Environment, Health and Safety Manager  
West Central Region

enc.



## ACKNOWLEDGMENT LETTER

Pekin Police Department  
400 Margaret Road  
Pekin, Illinois 61554

Mr. Mori Sorenson  
Safety-Kleen Corp.  
4704 NE 22nd Street  
Des Moines, Iowa 50313

Re: Contingency Plan Review Meeting  
Safety-Kleen Pekin, IL Service Center

Dear Mr. Sorenson:

\_\_\_\_\_ Yes - A representative of Pekin Police Department will attend the meeting on November 13, 1996.

\_\_\_\_\_ No - A representative of Pekin Police Department will not be attending the meeting on November 13, 1996.

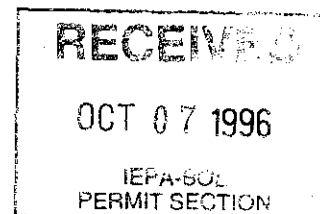
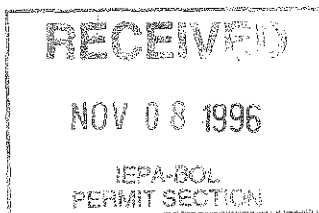
\_\_\_\_\_  
(Name - Please Print)

\_\_\_\_\_  
(Signature)

\_\_\_\_\_  
(Title)

\_\_\_\_\_  
(Date)

\_\_\_\_\_ Please check here if you do not have a copy of Safety-Kleen's contingency plan and one will be sent to you.





**CERTIFIED MAIL  
RETURN RECEIPT REQUESTED**

October 4, 1996

Ms. Flo Karnes  
Manager, Building Services  
Pekin Hospital  
600 S. 13th Street  
Pekin, Illinois 61554

Re: Pekin, Illinois Service Center  
14249 VFW Road  
Pekin, IL 61554

Dear Ms. Karnes:

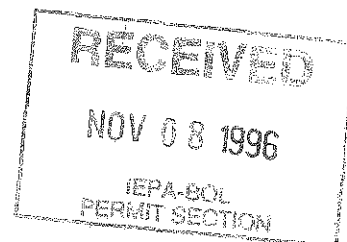
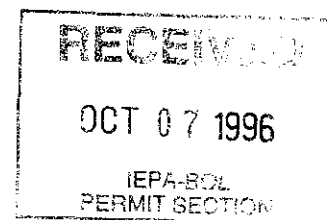
As required by our facilities Hazardous Waste Management RCRA Part B Permit, Safety-Kleen is required to attempt to arrange a meeting with the local emergency response entities to review all components of the contingency plan. Safety-Kleen has scheduled this meeting on November 13, 1996, at 10:00 a.m. Please indicate on the attached acknowledgment letter whether or not a representative from your agency will be attending.

If you have any questions, please contact me at 515/266-0319.

Sincerely,

Mori Sorenson  
Environment, Health and Safety Manager  
West Central Region

enc.



## ACKNOWLEDGMENT LETTER

Pekin Hospital  
600 S. 13th Street  
Pekin, Illinois 61554

Mr. Mori Sorenson  
Safety-Kleen Corp.  
4704 NE 22nd Street  
Des Moines, Iowa 50313

Re: Contingency Plan Review Meeting  
Safety-Kleen Pekin, IL Service Center

Dear Mr. Sorenson:

\_\_\_\_\_ Yes - A representative of Pekin Hospital will attend the meeting on November 13, 1996.

\_\_\_\_\_ No - A representative of Illinois Pekin Hospital will not be attending the meeting on November 13, 1996.

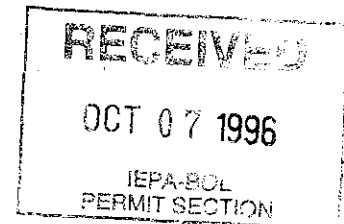
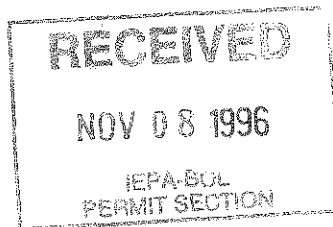
\_\_\_\_\_  
(Name - Please Print)

\_\_\_\_\_  
(Signature)

\_\_\_\_\_  
(Title)

\_\_\_\_\_  
(Date)

\_\_\_\_\_ Please check here if you do not have a copy of Safety-Kleen's contingency plan and one will be sent to you.





**CERTIFIED MAIL  
RETURN RECEIPT REQUESTED**

October 4, 1996

Mr. Jerry Privett  
Fire Chief  
Cincinnati Township Fire Protection District  
11751 Wagonsheller Road  
Pekin, Illinois 61554

Re: Pekin, Illinois Service Center  
14249 VFW Road  
Pekin, IL 61554

Dear Mr. Privett:

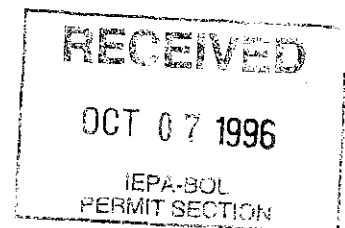
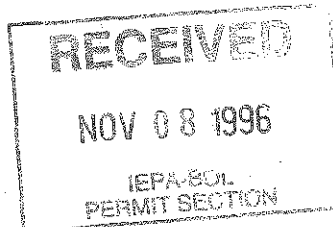
As required by our facilities Hazardous Waste Management RCRA Part B Permit, Safety-Kleen is required to attempt to arrange a meeting with the local emergency response entities to review all components of the contingency plan. Safety-Kleen has scheduled this meeting on November 13, 1996, at 10:00 a.m. Please indicate on the attached acknowledgment letter whether or not a representative from your agency will be attending.

If you have any questions, please contact me at 515/266-0319.

Sincerely,

Mori Sorenson  
Environment, Health and Safety Manager  
West Central Region

enc.



## ACKNOWLEDGMENT LETTER

Cincinnati Township Fire Protection District  
11751  
Pekin, Illinois 61554

Mr. Mori Sorenson  
Safety-Kleen Corp.  
4704 NE 22nd Street  
Des Moines, Iowa 50313

Re: Contingency Plan Review Meeting  
Safety-Kleen Pekin, IL Service Center

Dear Mr. Sorenson:

\_\_\_\_\_ Yes - A representative of Cincinnati Township Fire Protection District will attend the meeting on November 13, 1996.

\_\_\_\_\_ No - A representative of Cincinnati Township Fire Protection District will not be attending the meeting on November 13, 1996.

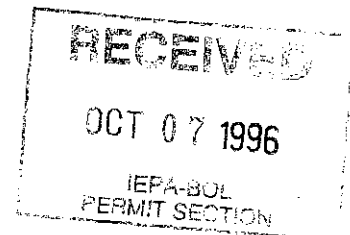
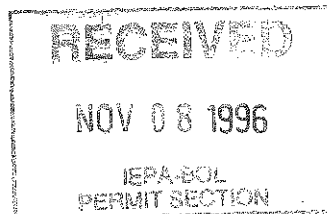
\_\_\_\_\_  
(Name - Please Print)

\_\_\_\_\_  
(Signature)

\_\_\_\_\_  
(Title)

\_\_\_\_\_  
(Date)

\_\_\_\_\_ Please check here if you do not have a copy of Safety-Kleen's contingency plan and one will be sent to you.





**CERTIFIED MAIL  
RETURN RECEIPT REQUESTED**

October 4, 1996

Mr. Victor Bell  
Smith Environmental Services  
2080 Carboy Road  
Mt. Prospect, Illinois 60056-5750

Re: Pekin, Illinois Service Center  
14249 VFW Road  
Pekin, IL 61554

Dear Mr. Bell:

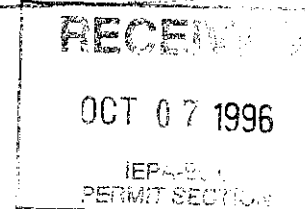
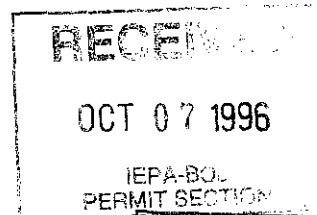
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If you have any questions, please contact me at 515/266-0319.

Sincerely,

Mori Sorenson  
Environment, Health and Safety Manager  
West Central Region

enc.





## ACKNOWLEDGMENT LETTER

Smith Environmental Services  
2080 Carboy Road  
Mt. Prospect, Illinois 60056-5750

Mr. Mori Sorenson  
Safety-Kleen Corp.  
4704 NE 22nd Street  
Des Moines, Iowa 50313

Re: Contingency Plan Review Meeting  
Safety-Kleen Pekin, IL Service Center

Dear Mr. Sorenson:

\_\_\_\_\_ Yes - A representative of Smith Environmental Services will attend the meeting on November 13, 1996.

\_\_\_\_\_ No - A representative of Smith Environmental Services will not be attending the meeting on November 13, 1996.

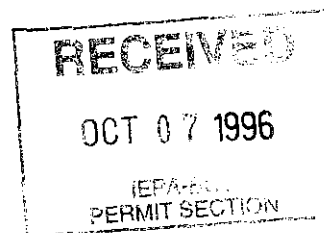
\_\_\_\_\_  
(Name - Please Print)

\_\_\_\_\_  
(Signature)

\_\_\_\_\_  
(Title)

\_\_\_\_\_  
(Date)

\_\_\_\_\_ Please check here if you do not have a copy of Safety-Kleen's contingency plan and one will be sent to you.





Certified Mail - # P040 602 825 - Return Receipt Requested

May 30, 1995

Mr. Ron Harmon  
Illinois Environmental Protection Agency  
Division of Land Pollution Control  
Permit Section  
2200 Churchill Road  
Springfield, Illinois 62794-9276

Subject: Part B Permit  
Pekin, Illinois Service Center  
ILD 093862811

Dear Mr. Harmon:

This letter is in reference to the Part B Permit for Safety-Kleen's Pekin, Illinois Service Center dated April 12, 1995. As we discussed, Safety-Kleen is seeking a clarification to permit condition Section II, F.4 on Page II-4 of II-8. The condition is written as follows:

4. The Permittee shall inspect each tank system to assess its condition. This inspection shall consist of a visual inspection, a pressure test and an ultrasonic thickness test in accordance with the following procedures:

As determined through discussions with the Agency, Safety-Kleen believes the pressure test included in this permit condition refers to a hydrostatic leak test as indicated in permit condition F.4.b. However, Safety-Kleen would like a clarification of this condition, in writing, from the Agency to ensure that Safety-Kleen and the Agency are in agreement regarding the tank testing requirements.

Once Safety-Kleen receives clarification of this item in writing, all issues regarding the Part B permit will be resolved, and Safety-Kleen will voluntarily withdraw the pending appeal.

RECEIVED

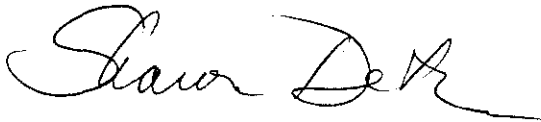
JUN 01 1995

IEPA - SOL  
PERMIT SECTION  
FAX 708/698-8500

Mr. Ron Harmon, IEPA  
May 30, 1995  
Page 2

If you have any questions or require any additional information, please contact me at 618/394-8428.

Sincerely,

A handwritten signature in cursive script, appearing to read "Sharon DeRoze". The signature is fluid and extends across the width of the text area.

Sharon DeRoze  
Environmental Engineer

Safety-Kleen Corp.  
20 Tucker Drive  
Caseyville, Illinois 62232



Certified Mail  
October 5, 1994

Mr. Victor Bell  
Riedel Environmental Services  
500 Eastern Ave.  
Bensenville, IL 60106

RE: Safety-Kleen Pekin, IL Service Center  
R.R. #3  
Pekin, IL 61554

Dear Mr. Bell,

Under terms of U.S. EPA Regulation 40 CFR 264.37, Safety-Kleen Corp. must make arrangements to familiarize local emergency response agencies with the layout of the facility, hazardous materials handled at the facility and associated hazards, location where facility personnel may be working, roads inside the facility and possible evacuation routes. Safety-Kleen has provided this information to you by previously sending you a copy of its Pekin Facility Contingency Plan.

Please find enclosed a copy of revised Table G-1 which must be replaced in your copy of the contingency plan. This revision is necessitated by a change in the emergency and alternate emergency coordinators for this facility.

As required by law, Safety-Kleen will need your acknowledgment of receipt of this letter, indications that you have been familiarized with the action necessary in the event of an emergency and that you are willing to provide assistance if called upon.

If you have any questions or desire to visit our facility, please contact Mr. Dan Patzschke at (309) 346-1818.

Sincerely,

Jennifer M. Jendras  
Environmental Engineer

cc: Branch Manager (File 1440)



Certified Mail  
October 5, 1994

Sheriff James Donahue  
Tazwell County Sheriff  
11 S. 4th Street  
Pekin, IL 61554

RE: Safety-Kleen Pekin, IL Service Center  
R.R. #3  
Pekin, IL 61554

Dear Mr. Donahue,

Under terms of U.S. EPA Regulation 40 CFR 264.37, Safety-Kleen Corp. must make arrangements to familiarize local emergency response agencies with the layout of the facility, hazardous materials handled at the facility and associated hazards, location where facility personnel may be working, roads inside the facility and possible evacuation routes. Safety-Kleen has provided this information to you by previously sending you a copy of its Pekin Facility Contingency Plan.

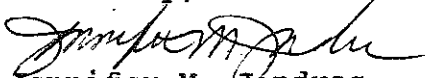
Please find enclosed a copy of revised Table G-1 which must be replaced in your copy of the contingency plan. This revision is necessitated by a change in the emergency and alternate emergency coordinators for this facility.

Our records indicate that the Sheriff's Department is primary emergency responder in the event of an emergency situation and will coordinate activities with other emergency response agencies. Back up assistance will be given by the Pekin Police Dept.

As required by law, Safety-Kleen will need your acknowledgment of receipt of this letter, indications that you have been familiarized with the action necessary in the event of an emergency and that you are willing to provide assistance if called upon.

If you have any questions or desire to visit our facility, please contact Mr. Dan Patzschke at (309) 346-1818.

Sincerely,

  
Jennifer M. Gendras  
Environmental Engineer

cc: Branch Manager (File 1440)

Certified Mail  
October 5, 1994



Pekin Police Department  
Robert Burress  
400 Margaret Street  
Pekin, IL 61554

RE: Safety-Kleen Pekin, IL Service Center  
R.R. #3  
Pekin, IL 61554

Dear Mr. Burress,

Under terms of U.S. EPA Regulation 40 CFR 264.37, Safety-Kleen Corp. must make arrangements to familiarize local emergency response agencies with the layout of the facility, hazardous materials handled at the facility and associated hazards, location where facility personnel may be working, roads inside the facility and possible evacuation routes. Safety-Kleen has provided this information to you by previously sending you a copy of its Pekin Facility Contingency Plan.

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As required by law, Safety-Kleen will need your acknowledgment of receipt of this letter, indications that you have been familiarized with the action necessary in the event of an emergency and that you are willing to provide assistance if called upon.

If you have any questions or desire to visit our facility, please contact Mr. Dan Patzschke at (309) 346-1818.

Sincerely,

Jennifer M. Jendras  
Environmental Engineer

cc: Branch Manager (File 1440)

Certified Mail  
October 5, 1994



Pekin Hospital  
Attn: Safety-Committee Chairman  
600 S. 13th Street  
Pekin, IL 61554

RE: Safety-Kleen Pekin, IL Service Center  
R.R. #3  
Pekin, IL 61554

Dear Sir or Madam,

Under terms of U.S. EPA Regulation 40 CFR 264.37, Safety-Kleen Corp. must make arrangements to familiarize local emergency response agencies with the layout of the facility, hazardous materials handled at the facility and associated hazards, location where facility personnel may be working, roads inside the facility and possible evacuation routes. Safety-Kleen has provided this information to you by previously sending you a copy of its Pekin Facility Contingency Plan.

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If you have any questions or desire to visit our facility, please contact Mr. Dan Patzschke at (309) 346-1818.

Sincerely,

Jennifer M. Jendras  
Environmental Engineer

cc: Branch Manager (File 1440)

Certified Mail  
October 5, 1994



Chief John Hamann  
Pekin Fire Dept.  
3232 Court  
Pekin, IL 61554

RE: Safety-Kleen Pekin, IL Service Center  
R.R. #3  
Pekin, IL 61554

Dear Mr. Hamann,

Under terms of U.S. EPA Regulation 40 CFR 264.37, Safety-Kleen Corp. must make arrangements to familiarize local emergency response agencies with the layout of the facility, hazardous materials handled at the facility and associated hazards, location where facility personnel may be working, roads inside the facility and possible evacuation routes. Safety-Kleen has provided this information to you by previously sending you a copy of its Pekin Facility Contingency Plan.

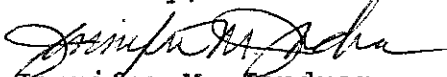
Please find enclosed a copy of revised Table G-1 which must be replaced in your copy of the contingency plan. This revision is necessitated by a change in the emergency and alternate emergency coordinators for this facility.

Our records indicate that the Cincinnati Township Fire Protection District is primary fire emergency responder in the event of an emergency situation and will coordinate activities with other emergency response agencies. Back up assistance will be given by the Pekin Fire Dept.

As required by law, Safety-Kleen will need your acknowledgment of receipt of this letter, indications that you have been familiarized with the action necessary in the event of an emergency and that you are willing to provide assistance if called upon.

If you have any questions or desire to visit our facility, please contact Mr. Dan Patzschke at (309) 346-1818.

Sincerely,

  
Jennifer M. Jendras  
Environmental Engineer

cc: Branch Manager (File 1440)



Certified Mail  
October 5, 1994



Jerry Privett  
Cincinnati Township Protection District  
11751 Wagonsheller Rd.  
Pekin, IL 61554

RE: Safety-Kleen Pekin, IL Service Center  
R.R. #3  
Pekin, IL 61554

Dear Mr. Privett,

Under terms of U.S. EPA Regulation 40 CFR 264.37, Safety-Kleen Corp. must make arrangements to familiarize local emergency response agencies with the layout of the facility, hazardous materials handled at the facility and associated hazards, location where facility personnel may be working, roads inside the facility and possible evacuation routes. Safety-Kleen has provided this information to you by previously sending you a copy of its Pekin Facility Contingency Plan.

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If you have any questions or desire to visit our facility, please contact Mr. Dan Patzschke at (309) 346-1818.

Sincerely,

Jennifer M. Jendras  
Environmental Engineer

cc: Branch Manager (File 1440)



1790600011 -- Tazewell County  
Safety Kleen - Pekin  
ILD093862811  
RCRA Permit Log #96  
Page 1 of 3

FACT SHEET  
NOTICE OF INTENT TO DENY  
RCRA HAZARDOUS WASTE PERMIT

Safety Kleen Corporation, Pekin, Illinois  
ILD093862811

This fact sheet has been prepared pursuant to the requirements of Title 35, Illinois Administrative Code (35 IAC), Section 705.143. The fact sheet is intended to be a brief summary of the principal facts and significant, factual, legal, methodological, and policy questions considered in preparing a draft denial of a RCRA permit. Safety Kleen Corporation is seeking a permit to store hazardous waste in tanks and containers. Pursuant to 35 Ill. Adm. Code, Section 705.143(a), this fact sheet is sent to the applicant and to any other person who requests it.

I. INTRODUCTION

Safety Kleen Corporation, located on R.R. #3, Pekin, Illinois is an existing facility which has been operating since April 1, 1976. A Part A application from Safety Kleen Corporation was received July 8, 1985, by the IEPA.

The Part B application cited herein is the application received by the Agency on February 19, 1988 and the later revisions thereof received November 7, 1988, April 11, 1990 and August 13, 1990 in response to the Notice of Deficiencies dated March 23, 1988, December 21, 1988 and June 8, 1990 respectively. Failure to correct these deficiencies as required by 35 Ill. Adm. Code Subtitle G, Section 705.123 and submit in a format requested by the Agency in previous Notices of Deficiencies and in meetings to obtain an acceptable (complete) Part B application for the satellite facilities, are the basis for this draft permit denial. The specific deficiencies are described in Attachment "A" to this fact sheet.

The Agency has concluded that the deficiencies are of such vital importance to the permit decision that issuance of a Part B permit with a compliance schedule or some other mechanism for obtaining the necessary information would not be feasible.

II. DESCRIPTION OF THE FACILITY

Safety Kleen stores and bulks hazardous waste and special waste in tanks and containers for treatment, recycling or disposal off-site. The facility has failed to adequately respond to previous notices of deficiencies issued by the Agency. As a result the Agency has determined that there are sufficient grounds for termination of Interim Status in accordance with 35 IAC 703.157(b). Upon the effective date of the final permit denial the facility must begin closure in accordance with 35 IAC, Part 725, Subpart G.



1790600011 -- Tazewell County  
Safety Kleen - Pekin  
ILD093862811  
RCRA Permit Log #96  
Page 2 of 3

### III. HAZARDOUS WASTE MANAGEMENT ACTIVITIES

#### 1. Container Storage

According to the information provided by Safety Kleen in their Part B permit application, dumpster sediment (D001, D006, D008), spent immersion cleaner (F002, F004), dry cleaning waste (F002) and paint waste (D001, D006, D007, D008, F003, F005) are stored in the container storage warehouse. The capacity of the warehouse is 6,912 gallons.

#### 2. Tank Storage

According to the information provided by Safety Kleen in their Part B permit application, spent mineral spirits (D001, D006, D008) are stored in a 20,000 gallon storage tank. Additionally, the Agency considers the metal dumpsters, where drums of spent mineral spirits are emptied and which drain to the storage tank, to be RCRA tanks.

### IV. PROCEDURES FOR REACHING A FINAL DECISION

Pursuant to 35 Ill. Adm. Code 705.162(a)(2), the public is given forty-five (45) days to review the application and comment on the draft denial prior to IEPA taking any final action. The comment period will begin on the first date of publication of the public notice in the Pekin Daily Times. The comment period will end on the forty-fifth day after the first date of publication of the public notice. When the Agency makes its final decision, or when the Agency decides to change its decision, notice will be given to the applicant and each person who has submitted written comments or requested notice of the final permit decision. The denial will become effective thirty-five (35) days after service of notice of the decision or at a later date if review is requested under 35 Ill. Adm. Code 705.212. In addition, copies of the draft denial fact sheet and application are available for review at the Pekin Public Library, 301 South Fourth Street, Pekin, Illinois.

Any interested person may submit written comments on the draft denial at the following address:

Illinois Environmental Protection Agency  
Government and Community Affairs, Attn: Kery Luly  
2200 Churchill Road  
Post Office Box 19276  
Springfield, Illinois 62794-9276

The administrative record is open for public inspection at the IEPA Springfield headquarters from 8:30 a.m. to 5:00 p.m., Monday through Friday. The administrative record contains the permit application, fact sheet, and other supporting documents and correspondence submitted to the IEPA. Inspections of the administrative record must be scheduled in advance by contacting the Public Notice Clerk at the above address.



1790600011 -- Tazewell County  
Safety Kleen - Pekin  
ILD093862811  
RCRA Permit Log #96  
Page 3 of 3

In response to requests received during the comment period or at the discretion of the IEPA, a public hearing may be held to clarify one or more issues concerning the draft denial of the application. A request for public hearing must be in writing and shall state the nature of the issues proposed to be raised in the hearing. Public Notice will be issued forty-five (45) days before any public hearing. If a hearing has been scheduled with the public notice, then further requests are not necessary.

For further information, please contact Keri Luly, Director's Office, Illinois Environmental Protection Agency at 2200 Churchill Road, Post Office Box 19276, Springfield, Illinois 62794-9276 or by telephone at 217/782-5562.

LWE:MAS:jab/3618/4-6



Attachment A  
Safety Kleen/Pekin  
RCRA Part B Log #96

The application was not submitted in the format required by the Agency (in accordance with the "RCRA Part B Permit Application Decision Guide"). The Agency has the authority to require information submitted in a prescribed fashion under 35 IAC, 702.106 and 702.123. The Agency feels it is essential to receive the Part B application in this format to facilitate timely review and to allow future modifications to be reviewed and incorporated into the Part B in the future.

DC:jab/3618n/13